

Michelle Dove

2023 Nov-07 PM 08:44
8 / 18 U.S. DISTRICT COURT
N.D. OF ALABAMA

<p style="text-align: center;">Page 1</p> <p>UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION</p> <p>CASE NUMBER 2:22-CV-01489-ACA</p> <p>SHARON DORSEY, Plaintiff, vs. I.C. SYSTEM, INC., Defendant.</p> <p>DEPOSITION TESTIMONY OF: MICHELLE DOVE</p> <p>COURT REPORTER: JENNIFER LEE, ACCR-97</p>	<p style="text-align: center;">Page 3</p> <p>1 leading questions, and that counsel for 2 the parties may make objections and assign 3 grounds at the time of trial or at the 4 time said deposition is offered in 5 evidence, or prior thereto.</p> <p>6 In accordance with Rule 5(d) of 7 the Alabama Rules of Civil Procedure, as 8 amended, effective May 15, 1988, I, 9 Jennifer Lee, am hereby delivering to 10 W. Whitney Seals the original transcript 11 of the oral testimony taken.</p> <p>12 Please be advised that this is 13 the same and not retained by the Court 14 Reporter, nor filed with the Court.</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>
<p style="text-align: center;">Page 2</p> <p>1 The reading and signing of this 2 deposition has not been waived.</p> <p>3</p> <p>4 S T I P U L A T I O N S:</p> <p>5</p> <p>6 IT IS STIPULATED AND AGREED by and 7 between the parties through their 8 respective counsel that the deposition of 9 MICHELLE DOVE may be taken before Jennifer 10 Lee, Certified Shorthand Reporter and 11 Notary Public, State at Large, via Zoom, 12 on August 18, 2023, commencing at 13 approximately 8:30 a.m.</p> <p>14 IT IS FURTHER STIPULATED AND 15 AGREED that the signature to and the 16 reading of the deposition by the witness 17 is not waived.</p> <p>18 IT IS FURTHER STIPULATED AND 19 AGREED that it shall not be necessary for 20 any objections to be made by counsel to 21 any questions, except as to form or</p>	<p style="text-align: center;">Page 4</p> <p>1 A P P E A R A N C E S:</p> <p>2</p> <p>3</p> <p>4 FOR THE PLAINTIFF: 5 W. Whitney Seals, Esq. 6 COCHRUN & SEALS, LLC 7 300 Richard Arrington Jr. Boulevard 8 Suite 400 9 Birmingham, Alabama 35203</p> <p>10 John Hubbard, Esq. 11 P.O. Box 953 12 Birmingham, Alabama 35203</p> <p>13</p> <p>14</p> <p>15</p> <p>16 FOR THE DEFENDANTS: 17 Dale T. Golden, Esq. 18 GOLDEN, SCAZ, GAGAIN, PLLC 19 1135 Marbella Plaza Drive 20 Tampa, Florida 33619</p> <p>21</p> <p>22</p> <p>23</p>

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(205) 326-4444**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**
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<p style="text-align: right;">Page 5</p> <p>1 INDEX:</p> <p>2</p> <p>3</p> <p>4 EXAMINATION BY: PAGE NO.</p> <p>5 Mr. Seals 7</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 INDEX OF EXHIBITS:</p> <p>11</p> <p>12</p> <p>13 FOR THE PLAINTIFF: PAGE NO.</p> <p>14 1 - Notice of Deposition 12</p> <p>15 2 - Account History Notes 28</p> <p>16 3 - Answers to Interrogatories 72</p> <p>17 4 - Information Reported to CRAs 80</p> <p>18 5 - Dispute Letter 96</p> <p>19 6 - Request for Admissions 106</p> <p>20 7 - AT&T Response 110</p> <p>21 8 - AT&T Availability Form 112</p> <p>22 9 - Account Summary 115</p> <p>23</p>	<p style="text-align: right;">Page 7</p> <p>1</p> <p>2 THE COURT REPORTER: Usual</p> <p>3 stipulations?</p> <p>4 MR. SEALS: Fine by me.</p> <p>5 MR. GOLDEN: Okay.</p> <p>6</p> <p>7 EXAMINATION BY MR. SEALS:</p> <p>8 Q. Good morning, Ms. Dove. How are</p> <p>9 you?</p> <p>10 A. I'm well. Thank you.</p> <p>11 Q. Good. My name is Whitney Seals,</p> <p>12 and I am an attorney that represents Ms.</p> <p>13 Sharon Dorsey in a case that she has</p> <p>14 brought against I.C. System. Have you ever</p> <p>15 given a deposition before today?</p> <p>16 A. Yes.</p> <p>17 Q. How many times?</p> <p>18 A. I don't know.</p> <p>19 Q. Okay. So you're familiar at</p> <p>20 least with the format, question and answer</p> <p>21 format. Please allow me to finish my</p> <p>22 question before you answer, those sorts of</p> <p>23 things; is that correct?</p>
<p style="text-align: right;">Page 6</p> <p>1</p> <p>2</p> <p>3 I, Jennifer Lee, a Certified</p> <p>4 Shorthand Reporter of Birmingham, Alabama,</p> <p>5 and a Notary Public for the State of</p> <p>6 Alabama at Large, acting as Commissioner,</p> <p>7 certify that on this date, pursuant to the</p> <p>8 Alabama Rules of Civil Procedure and the</p> <p>9 foregoing stipulation of counsel, there</p> <p>10 came before me via Zoom, commencing at</p> <p>11 approximately 8:30 a.m. on August 18, 2023,</p> <p>12 MICHELLE DOVE, witness in the above cause,</p> <p>13 for oral examination, whereupon the</p> <p>14 following proceedings were had:</p> <p>15</p> <p>16</p> <p>17 MICHELLE DOVE,</p> <p>18 having been first duly sworn, was</p> <p>19 examined and testified as follows:</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>	<p style="text-align: right;">Page 8</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Excellent. You told me</p> <p>3 your name is Michelle Dove. What is your</p> <p>4 current employer, and what is your job</p> <p>5 title?</p> <p>6 A. I.C. System, Inc., my title is</p> <p>7 general counsel and chief compliance</p> <p>8 officer.</p> <p>9 Q. All right. And how long have you</p> <p>10 been with I.C. System, Inc.?</p> <p>11 A. Since February of 2014.</p> <p>12 Q. All right. And what is your --</p> <p>13 what are your job duties as general counsel</p> <p>14 and chief compliance officer, please?</p> <p>15 A. I handle litigation involving the</p> <p>16 company. I review contracts. I am</p> <p>17 responsible for oversight of the compliance</p> <p>18 and risk management system.</p> <p>19 Q. All right. As part of that, do</p> <p>20 you have a hand in preparing or reviewing</p> <p>21 policy as it applies to I.C. System's</p> <p>22 employees?</p> <p>23 A. Yes.</p>

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<p style="text-align: right;">Page 9</p> <p>1 Q. Okay. You said you're general 2 counsel as well. Are you an attorney? 3 A. Yes. 4 Q. All right. Are you licensed up 5 in Minnesota? 6 A. Yes. 7 Q. Got you. All right. Prior to 8 I.C. System, did you have any work in the 9 collection industry? 10 A. I worked for a law firm, but I 11 worked with collection agencies. 12 Q. Okay. All right. Other than 13 general counsel and chief compliance 14 officer, have you held any other titles 15 with I.C. System? 16 A. I am the corporate secretary and 17 a vice president. 18 Q. All right. How many employees 19 does I.C. System have? 20 A. Approximately, 500. It might be 21 closer to 450, between 450 and 500. 22 Q. Yes, ma'am. And I note that 23 y'all are up in Minnesota. Do you have</p>	<p style="text-align: right;">Page 11</p> <p>1 Q. Okay. All right. And you 2 understand that I.C. System has designated 3 you as the corporate representative to 4 answer my questions today and that your 5 answers to my questions are binding on I.C. 6 System? 7 A. Yes. 8 Q. Okay. So I sent over some 9 exhibits to Mr. Golden. Did he provide 10 those to you? 11 A. I believe so. 12 Q. Okay. Have you had a chance to 13 take a look at those before today? 14 A. I glanced at a few of them. I 15 didn't spend a lot of time on them. 16 Q. I got you. And as an attorney, 17 you know I cannot invade attorney/client 18 privilege, so none of my questions seek to 19 do that. But putting that to the side, did 20 you review anything specifically in 21 preparation for today? 22 A. Yes. 23 Q. What did you look at?</p>
<p style="text-align: right;">Page 10</p> <p>1 locations in other states or around the 2 country? 3 A. Yes. 4 Q. Okay. Where else are y'all 5 located? 6 A. Onalaska, Wisconsin. 7 Q. Okay. So Wisconsin and 8 Minnesota, is that primarily the base of 9 operations for y'all? 10 A. Yes. 11 Q. Got you. Okay. And what exactly 12 is the nature of I.C. System's business? 13 A. We collect unpaid accounts for 14 third parties. 15 Q. Okay. Does I.C. System collect 16 any accounts on its behalf, or is it 17 strictly collecting for other creditors? 18 A. Well, if we have unpaid AR, we 19 attempt to collect it. 20 Q. Sure. But does I.C. System act 21 as any kind of debt buyer, or is it just a 22 collection agency? 23 A. We do not purchase debts.</p>	<p style="text-align: right;">Page 12</p> <p>1 A. I looked at communications from 2 counsel. I looked at account notes. Like 3 I said, I glanced at some of the exhibits. 4 Q. Okay. 5 A. And, excuse me, I reviewed some 6 of the pleadings as well. 7 Q. Okay. That works for me. 8 Plaintiff's Exhibit 1 that I want to offer 9 is the deposition notice that I filed in 10 this case. 11 12 (Plaintiff's Exhibit 1 was 13 marked for identification.) 14 15 Q. Had you had a chance to take a 16 look at that? 17 A. I looked at it when it was 18 received. I haven't spent a lot of time on 19 it since then. 20 Q. I understand, and we'll get to 21 the topics in there in a moment. But is 22 it -- may I assume that you are the person 23 that can provide testimony on those topics?</p>

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<p style="text-align: right;">Page 13</p> <p>1 There's not going to be a second 30(b)(6) 2 witness?</p> <p>3 A. I'm the best you've got.</p> <p>4 Q. Best we've got, that's fine. Did 5 you happen to listen to the two phone call 6 recordings that were produced by I.C. 7 System in this case?</p> <p>8 A. I listened to them during 9 discovery production, and I haven't 10 reviewed them since.</p> <p>11 Q. Okay. All right. I know that a 12 couple of names popped up, and if I 13 pronounce these incorrectly, please feel 14 free to correct me. Barbara Hauke; is that 15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. And Lori Bagniewski?</p> <p>18 A. That sounds correct.</p> <p>19 Q. Sounds right. Okay. Did you 20 ever speak with either Ms. Hauke or Ms. 21 Bagniewski in preparation for today?</p> <p>22 A. I did not.</p> <p>23 Q. All right. Do you know, is</p>	<p style="text-align: right;">Page 15</p> <p>1 on it. Do you have any hand in drafting or 2 reviewing FDCPA compliance policy as it 3 relates to I.C. System's employees?</p> <p>4 A. Yes.</p> <p>5 Q. Is that the same with FCRA 6 compliance?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. So I'm clear, I.C. System 9 is a debt collector that collects debts 10 owed or alleged to be owed to others; is 11 that right?</p> <p>12 A. Yes.</p> <p>13 Q. All right. And it also -- as 14 part of that, it sends reports on consumers 15 or at least credit reports on consumers 16 that it's collecting debts from; is that 17 also correct?</p> <p>18 A. I don't understand your question.</p> <p>19 Q. Sure. Does I.C. System provide 20 information to credit bureaus, such as 21 balance information, account information, 22 that sort of thing, in and about its 23 business as a debt collector?</p>
<p style="text-align: right;">Page 14</p> <p>1 Barbara Hauke still employed at I.C. 2 System?</p> <p>3 A. I believe so.</p> <p>4 Q. Okay. And how about Ms. 5 Bagniewski?</p> <p>6 A. I believe so.</p> <p>7 Q. All right. And since you have 8 looked at the pleadings, does I.C. System 9 understand that my client has brought 10 claims against it under the Fair Debt 11 Collection Practices Act, or FDCPA, and 12 Fair Credit Reporting Act, FCRA?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Are you familiar with the 15 FDCPA?</p> <p>16 A. Yes.</p> <p>17 Q. Are you familiar with that 18 through your experience? So do you have to 19 do continuing education on that particular 20 statute?</p> <p>21 A. Both.</p> <p>22 Q. Both. All right. And I think we 23 talked about it, but I'll put a finer point</p>	<p style="text-align: right;">Page 16</p> <p>1 A. I.C. System furnishes data to the 2 credit reporting agencies.</p> <p>3 Q. Okay. And I.C. System does that 4 as a tool to help it collect debts, does it 5 not?</p> <p>6 A. I'm not sure I would describe it 7 that way.</p> <p>8 Q. Then why would I.C. System 9 furnish that information on behalf of the 10 creditors it's collecting for?</p> <p>11 A. Oftentimes, that is a very 12 valuable way for us to contact consumers. 13 Oftentimes, debts are placed that don't 14 have updated addresses or contact 15 information. And so when we credit report 16 the debt, that often drives consumers to 17 contact I.C. System about the account.</p> <p>18 Q. You also send letters to those 19 consumers as part of the process, do you 20 not?</p> <p>21 A. Sometimes.</p> <p>22 Q. Okay. But would you agree that 23 credit reporting also is helpful in</p>

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<p style="text-align: right;">Page 17</p> <p>1 collecting the debt?</p> <p>2 A. Sometimes.</p> <p>3 Q. Okay. If a consumer like Ms.</p> <p>4 Dorsey disputes some information I.C.</p> <p>5 System is reporting on a debt with a credit</p> <p>6 reporting agency like TransUnion, would you</p> <p>7 agree that I.C. System is required to</p> <p>8 conduct an investigation of that dispute if</p> <p>9 they're notified about it?</p> <p>10 MR. GOLDEN: Form.</p> <p>11 A. Yes.</p> <p>12 Q. And the way it works is that a</p> <p>13 credit reporting agency, once it's notified</p> <p>14 of a consumer's dispute, will then notify</p> <p>15 I.C. System of that dispute typically; is</p> <p>16 that right?</p> <p>17 A. Typically.</p> <p>18 Q. Typically. Okay. And the way</p> <p>19 that's done I've seen is through what's</p> <p>20 called an automated consumer dispute</p> <p>21 verification form or ACDV; is that right?</p> <p>22 A. That's one way we can be notified</p> <p>23 of a dispute.</p>	<p style="text-align: right;">Page 19</p> <p>1 would constitute a reasonable investigation</p> <p>2 of a consumer dispute?</p> <p>3 MR. GOLDEN: Form.</p> <p>4 A. The nature of the investigation</p> <p>5 needs to be commensurate with the nature of</p> <p>6 the dispute. So depending on the</p> <p>7 information that we receive in the dispute,</p> <p>8 that will then dictate the nature of the</p> <p>9 investigation.</p> <p>10 Q. That makes sense. If a consumer</p> <p>11 sent in a letter -- and there's multiple</p> <p>12 ways to dispute; agreed? Online, phone</p> <p>13 call, written letter, that sort of thing;</p> <p>14 would you agree with that?</p> <p>15 A. Yes.</p> <p>16 Q. If a consumer sent a letter in to</p> <p>17 the credit reporting agency disputing an</p> <p>18 account, would a reasonable investigation</p> <p>19 include reading the dispute letter so that</p> <p>20 you can make sure you know what the nature</p> <p>21 of the dispute is?</p> <p>22 MR. GOLDEN: Form.</p> <p>23 A. It may.</p>
<p style="text-align: right;">Page 18</p> <p>1 Q. Okay. That works through --</p> <p>2 explain how that works. If you receive</p> <p>3 notification through an ACDV, how does that</p> <p>4 happen on I.C. System's end?</p> <p>5 MR. GOLDEN: Form.</p> <p>6 A. We receive dispute information</p> <p>7 through an automated process called</p> <p>8 e-OSCAR. The dispute is received. I.C.</p> <p>9 System investigates the information related</p> <p>10 to the dispute and then reports the results</p> <p>11 of the investigation back to the credit</p> <p>12 bureaus.</p> <p>13 Q. Got you. And getting that ACDV</p> <p>14 will trigger I.C. System to then conduct</p> <p>15 its own investigation of the dispute; is</p> <p>16 that right?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. Do you agree that I.C.</p> <p>19 System's investigation of a dispute must be</p> <p>20 reasonable?</p> <p>21 MR. GOLDEN: Form.</p> <p>22 A. Yes.</p> <p>23 Q. According to I.C. System, what</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. All right. Is there any time</p> <p>2 when an I.C. System's employee</p> <p>3 investigating a dispute would not read a</p> <p>4 letter that's sent along with the dispute?</p> <p>5 MR. GOLDEN: Form.</p> <p>6 A. There are times when information</p> <p>7 is provided to the credit reporting</p> <p>8 agencies regarding a dispute and that</p> <p>9 information isn't passed on to I.C. System.</p> <p>10 Q. Okay. I got you. But if you'll</p> <p>11 assume with me that the credit reporting</p> <p>12 agency includes a copy of the consumer's</p> <p>13 letter with the ACDV, would you agree it's</p> <p>14 reasonable to read the letter as well as</p> <p>15 part of the investigation?</p> <p>16 MR. GOLDEN: Form.</p> <p>17 A. Yes.</p> <p>18 Q. All right. Now, when I.C. System</p> <p>19 investigates a dispute, would you agree</p> <p>20 that typically there are three outcomes?</p> <p>21 It's either verified, the information can't</p> <p>22 be verified, or it's deleted as inaccurate;</p> <p>23 would you agree with that?</p>

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<p>1 A. I'm not sure if those are the 2 only three outcomes.</p> <p>3 Q. Are you aware of any other 4 outcomes other than verify, can't be 5 verified, or delete as inaccurate?</p> <p>6 A. I'm not sure the full menu of 7 outcomes regarding an ACDV dispute.</p> <p>8 Q. Okay. If I.C. System gets a 9 dispute from a consumer through an ACDV 10 like we've been talking about and I.C. 11 System doesn't already have evidence 12 establishing that an item of disputed 13 information is true, does I.C. System then 14 seek out and obtain that information before 15 reporting the information is verified?</p> <p>16 MR. GOLDEN: Form.</p> <p>17 A. I'm sorry. You lost me there.</p> <p>18 Q. I'll go through it again, and you 19 are doing a great job. If I ask something 20 that doesn't make sense, don't answer it 21 until you understand. That's fine.</p> <p>22 So let me walk through this. If 23 I.C. System gets a dispute through the ACDV</p>	<p>1 information like a police report or a fraud 2 packet, then that obviously would require a 3 higher level of investigation. And there 4 are times when the consumer provides 5 information that we can't verify using our 6 collections software. And in that case, we 7 would go back to the creditor and request 8 additional information.</p> <p>9 Q. Thank you. That's helpful. So 10 if there's something that the employee at 11 I.C. System might need that the creditor 12 might have, they would go back to the 13 creditor and request it; fair?</p> <p>14 MR. GOLDEN: Form.</p> <p>15 A. If the information is required in 16 order to answer the dispute that we've 17 received.</p> <p>18 Q. Okay. And would that sort of 19 information include underlying account 20 documents, like account applications or 21 bills for an account?</p> <p>22 A. It may.</p> <p>23 Q. Per its policy, I.C. System can't</p>
<p style="text-align: center;">Page 22</p> <p>1 process, okay, and then the employee at 2 I.C. System does not have evidence or can't 3 find anything establishing that that 4 disputed information is true, is the policy 5 then to seek out some information to make 6 sure that it can be verified or what 7 happens at that point?</p> <p>8 MR. GOLDEN: Form.</p> <p>9 A. Well, again, it's going to depend 10 on the nature of the dispute and the 11 information in the dispute. If we get a 12 dispute that's what we would call a generic 13 or a simple dispute that just says not 14 mine, that is easy. We can answer the 15 dispute by looking at the demographic 16 information in the ACDV and comparing it to 17 the information in our account. If the 18 name, if the address, sometimes date of 19 birth, social, if that information matches, 20 then we have enough information in our 21 system to verify back to the bureaus that 22 it actually is the correct consumer.</p> <p>23 If a consumer provides</p>	<p style="text-align: center;">Page 24</p> <p>1 guess at whether disputed information is 2 accurate before it verifies it; correct?</p> <p>3 MR. GOLDEN: Form.</p> <p>4 A. I'm sorry. Could you ask that 5 again?</p> <p>6 Q. If I.C. System verifies 7 information is correct that's been 8 disputed, that verification needs to be 9 based on something; right?</p> <p>10 MR. GOLDEN: Form.</p> <p>11 A. I don't understand your question.</p> <p>12 Q. Okay. So someone writes in and 13 says, hypothetically, the balance is wrong. 14 Okay. For whatever reason, the balance is 15 wrong. It says \$500, and I think it's 16 \$400. All right. I.C. System has to do 17 something to verify that the balance is 18 correct. It can't just rubber stamp and 19 say, no, it's correct; do you agree with 20 that?</p> <p>21 MR. GOLDEN: Form.</p> <p>22 A. Well, in that case, we would look 23 in our collections system and see the</p>

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<p>1 balance that is reported by the creditor. 2 And because our creditors update our 3 account information in realtime, the 4 information that they are providing, we 5 rely on that as the amount that's 6 accurately due -- excuse me, validly 7 due and owing.</p> <p>8 Q. Sure. But my point, I guess, 9 that I'm trying to make sort of awkwardly 10 is that I.C. System, when it verifies 11 information, relies upon information that's 12 been provided to it? It doesn't just make 13 it up as it goes; fair?</p> <p>14 A. Correct. I.C. System relies on 15 the information provided by the creditor.</p> <p>16 Q. All right. And if I.C. System 17 cannot verify some piece of information, 18 what happens in that instance?</p> <p>19 MR. GOLDEN: Form.</p> <p>20 A. If we don't have the information 21 in our collection software to verify the 22 validity of the debt, then we request that 23 information from the creditor.</p>	<p>1 A. Yes. 2 Q. All right. Do you know what AT&T 3 U-verse is? 4 A. A telephone service. 5 Q. Sure. I think -- 6 A. It may be cable as well. 7 Q. I think it's like a whole 8 package, internet, phone, that sort of 9 thing. Is that your understanding? 10 A. Yes. AT&T provides 11 telecommunication services. 12 Q. Got it. Does I.C. System 13 regularly attempt to collect debts alleged 14 to be owed to AT&T? 15 A. Yes. 16 Q. As part of the policies and 17 procedures, I.C. System maintains account 18 history notes for the debts it attempts to 19 collect; is that correct? 20 A. I.C. System uses collection 21 software that is continuously being updated 22 by AT&T. 23 Q. What is the term that I.C. System</p>
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<p>1 Q. If the creditor cannot provide 2 that to I.C. System, what's I.C. System's 3 policy at that point?</p> <p>4 A. It depends on the nature of the 5 dispute.</p> <p>6 Q. Okay.</p> <p>7 A. If the creditor will no longer 8 stand behind the validity of the debt, then 9 we will stop reporting and stop collecting 10 the account.</p> <p>11 Q. Okay. At that point, does I.C. 12 System request that the tradeline be 13 deleted?</p> <p>14 A. If the creditor is no longer able 15 to verify the debt, yes.</p> <p>16 Q. All right. Let's talk about the 17 account that I.C. System was collecting 18 from Ms. Dorsey. Okay?</p> <p>19 A. Sure.</p> <p>20 Q. Based on what I have seen, I.C. 21 System was trying to collect an AT&T 22 U-verse account from Ms. Dorsey. Is that 23 your understanding?</p>	<p>1 uses for the printout of that data? I have 2 seen collection notes, account notes. What 3 does I.C. System say? 4 A. We call a printout of the 5 collection account notes either the account 6 summary or the account history. 7 Q. Okay. What I would like to mark 8 as Exhibit 2 is a document Bates labeled 9 ICS 4 through 15. 10 (Plaintiff's Exhibit 2 was 11 marked for identification.) 12 Q. It looks to be in reverse order, 13 but this appears to be the account -- what 14 did you call it again? Forgive me. 15 A. Can we share the document? I'm 16 not sure what we're looking at. 17 Q. Sure. Hang on. Do you have it 18 in front of you by any chance? 19 A. I don't. 20 Q. Okay. Give me just a second 21 here. I wasn't prepared to do that. Can</p>

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<p style="text-align: right;">Page 29</p> <p>1 you give me just one moment?</p> <p>2 A. Of course.</p> <p>3 Q. Hang on. Okay. Let me see if I 4 can get this up for you. All right. Tell 5 me if you see what I've got.</p> <p>6 A. I see Exhibit 2.</p> <p>7 Q. Okay. All right. Let me zoom 8 this out just a touch, so this -- and it's 9 blurry. I'll grant you that. This is how 10 it was produced to me. As I said, it's -- 11 do you see at the bottom ICS 4?</p> <p>12 A. Yes.</p> <p>13 Q. And then it goes to ICS 15. Do 14 you see that as well?</p> <p>15 A. Yes.</p> <p>16 Q. All right. It starts on December 17 the 20th, 2020. Do these appear to be the 18 account history notes that we've been 19 talking about?</p> <p>20 A. Yes.</p> <p>21 Q. All right.</p> <p>22 MR. GOLDEN: Hey, Whitney?</p> <p>23 MR. SEALS: Yes, sir.</p>	<p style="text-align: right;">Page 31</p> <p>1 A. Can we just look at the Bates 2 numbers? Sorry. I just want to make sure 3 that there -- it seemed like maybe there 4 were two different sets of numbers there.</p> <p>5 Q. Sure. Sure.</p> <p>6 A. It shouldn't be, but I just want 7 to make sure. I thought you said you were 8 starting at four.</p> <p>9 Q. Yes. One moment. Let me screen 10 share what I just got. I will be happy to 11 do it. All right. Do you see that, ma'am?</p> <p>12 A. Yes.</p> <p>13 Q. All right. This doesn't appear 14 to be Bates labeled.</p> <p>15 MR. GOLDEN: Yeah. It --</p> <p>16 Q. At the top -- okay. All right. 17 12 -- now, I have -- we started at four on 18 mine. This one starts at one. Does that 19 make sense? I think it's --</p> <p>20 MR. SEALS: Dale, you're shaking 21 your head.</p> <p>22 MR. GOLDEN: I mean, I don't know 23 why that would be on there. Again, this is</p>
<p style="text-align: right;">Page 30</p> <p>1 MR. GOLDEN: I just want to jump 2 in because I have no understanding of why 3 those notes would look like that. Really, 4 I feel bad that they were produced to you 5 looking like that. It almost looks like 6 they were faxed, and they weren't. I mean, 7 they come to us as basically a PDF 8 document, and so I'm at a loss to 9 understand why they look like that.</p> <p>10 MR. SEALS: I was kind of the 11 same way. And, normally, I would ask for a 12 clearer copy. I'm not sure why that didn't 13 happen in this case. Dale, if you have a 14 clearer copy and wanted to shoot it, I'll 15 pull it up. I'm happy to.</p> <p>16 MR. GOLDEN: Yeah. Why don't we 17 take like a five-minute break?</p> <p>18 MR. SEALS: All right. Yeah. 19 That'll make it better.</p> <p>20</p> <p>21 (Break taken.)</p> <p>22</p> <p>23 Q. Okay.</p>	<p style="text-align: right;">Page 32</p> <p>1 what --</p> <p>2 Q. If there's something in here 3 that's missing that I was going to ask you 4 about, I can go back to the other one, but 5 I feel pretty confident this is it and 6 we'll use this. This is a document, 7 Exhibit 2, that's Bates stamped ICS 1 8 through 12; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. All right. And these appear to 11 be a better copy of the account notes than 12 the one we just looked at; is that correct?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. All right. So in looking 15 at these, they look like they go in reverse 16 order and start at 12/28/20 and end in 17 October of '22. So I'll start down here on 18 page 12. Looking at this or can you tell 19 from here when the account was placed with 20 I.C. System by AT&T?</p> <p>21 A. Yes.</p> <p>22 Q. When would that have been?</p> <p>23 A. December 28th, 2020, at 3:10 p.m.</p>

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<p style="text-align: right;">Page 33</p> <p>1 Q. All right. And do you know what 2 information AT&T provided to I.C. System 3 when it placed this account for collection? 4 A. Yes. 5 Q. What information was provided to 6 I.C. System by AT&T? 7 A. All of the information that has 8 the word added in the third column. 9 Q. All right. So if we look at 10 this, it looks like an email, a name, an 11 address, and some telephone numbers. Does 12 that -- 13 A. Debt number has to do more with 14 internal labeling of the account. Those 15 aren't telephone numbers. 16 Q. Got you. Okay. So forgive me. 17 I meant telephone number right here where 18 it says unknown. It's redacted, but 19 there's something there. Does that appear 20 to be a phone number that would've been 21 provided? 22 A. Yes. Sorry. I was confused. 23 Q. That's okay. That's okay. So</p>	<p style="text-align: right;">Page 35</p> <p>1 A. I believe that would be 2 information about the amount due and owing. 3 Q. Okay. And then there's another 4 one above that. Is that the same thing or 5 something different? 6 A. I'm not sure. 7 Q. All right. And then if we move 8 up, there are -- there's a warning. Do you 9 know what that is? 10 A. It looks like the phone number 11 has an invalid prefix. And so it's just 12 flagging that number as likely being a bad 13 number. 14 Q. All right. And then we see 15 status change from batch entered to active. 16 Is that simply activating the account to be 17 collected? 18 A. I believe it's moving into the 19 next phase of collections. Yes. 20 Q. Okay. And then current linked 21 debt phase, state ID changed from nothing 22 to a number. Do you know what that is? 23 A. It's another internal</p>
<p style="text-align: right;">Page 34</p> <p>1 we've got an email, name, address, a bill. 2 Is that what that is? And I'm sort of 3 pointing at it here. 4 A. It looks like a secondary 5 address. 6 Q. Okay. 7 A. Oh, excuse me. It looks like the 8 billing address is the same as the address 9 that was provided. So sometimes there are 10 multiple addresses, but it looks like the 11 P.O. Box is the billing address. 12 Q. Understood. Understood. And 13 then I want to scroll slowly through this, 14 and if you see anything else that AT&T 15 provided other than the email address, 16 name, and billing address, stop me. Okay? 17 A. Yes. 18 Q. And you said the debt number 19 things are internal recordkeeping; right? 20 A. Correct. 21 Q. And then here, what are we 22 looking at here? 31044 debt number, 23 balance line item, what is that?</p>	<p style="text-align: right;">Page 36</p> <p>1 administrative number. I'm not sure what 2 it means. 3 Q. Okay. And it looks like 4/17, it 4 was assigned to I.C. house collector. Is 5 that like a queue that they choose from? 6 A. It's going into a group of agents 7 who may be eligible to work the account. 8 Q. Okay. And then what is the next 9 one here that starts with owner team 10 change? What are you communicating there? 11 A. This, again, is similar. It's 12 going into the house global, so it's going 13 into a pool of debt collectors. 14 Q. All right. And then any 15 significance for the top two? 16 A. It's just more internal coding. 17 Q. Okay. And then any significance 18 here with these first two on I.C. System -- 19 let me get the page -- ten? 20 A. Just more internal coding, I 21 believe. 22 Q. Okay. Anything else that you see 23 on that date that is of significance to the</p>

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<p style="text-align: right;">Page 37</p> <p>1 collection efforts?</p> <p>2 A. Well, the batch processing is 3 applying some of our collection strategies. 4 So like the letter only debt numbers and 5 preprocessing debt, you can see then it's 6 applying a letter plan, and then it's 7 applying some of the initial scrubs. And 8 so at 41726, I guess there's a lot of those 9 entries. But vendor data, a pin request, 10 now it's starting scrubs and so it's going 11 to look for bankruptcy. It's going to look 12 for, DEC is deceased, so some of these 13 scrubs are now starting just to make sure 14 that our information is valid.</p> <p>15 Q. Got you. Is this -- this top 16 one, is this the collection strategy you 17 just mentioned?</p> <p>18 A. Yes.</p> <p>19 Q. We're going to ICS 9 and we're 20 still on 12/28/20. Anything significant 21 that you see on the screen here for these 22 first one, two, three, four, five, six, 23 seven entries?</p>	<p style="text-align: right;">Page 39</p> <p>1 A. Correct.</p> <p>2 Q. Okay. So they -- AT&T provided 3 the social security number, date of birth, 4 name, billing address, and at least a 5 telephone number. Did I get that correct?</p> <p>6 A. Yes. And I believe there's 7 other -- and we can see notes about the 8 balance, but they would have provided the 9 balance, payment history. The service 10 address usually comes over on the file. So 11 this is a summary of the account history. 12 There may be more information in the actual 13 collection software that's not produced on 14 these notes.</p> <p>15 Q. Okay. So we're not -- can you 16 look at this and do you know exactly what 17 was provided, or is it what you would've 18 expected to be provided?</p> <p>19 A. Well, I know all of the 20 information that says added is account 21 information that we got from AT&T, but 22 there may be additional information that 23 doesn't appear on these history notes.</p>
<p style="text-align: right;">Page 38</p> <p>1 A. Well, so the fourth row up from 2 the bottom now is assigning it to the AT&T 3 team.</p> <p>4 Q. Okay.</p> <p>5 A. And then it's talking about 6 intensive phase, so that really is 7 describing the method of collection. I 8 should note that in order to credit report 9 an account, the creditor would provide I.C. 10 System with either the social or the date 11 of birth. I don't believe that either of 12 those pieces of information appear in the 13 account history just because of the 14 sensitive nature of the information.</p> <p>15 Q. Okay.</p> <p>16 A. But that also would have been 17 provided.</p> <p>18 Q. All right. So you make a good 19 point. While we don't see that, I don't 20 have any reason to doubt they provided the 21 social security number and date of birth to 22 you. Otherwise, you wouldn't credit 23 report; right?</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. What sort of information would 2 that be typically, that wouldn't appear 3 here, that was provided by AT&T?</p> <p>4 A. Well, I kind of went over it, but 5 it's social security number, date of birth, 6 balance information, service address. And 7 I'm not sure if that comes over in the 8 original placement file or if there's a 9 supplemental file that AT&T provides. We 10 work off of -- AT&T has its own collection 11 software that I.C. System has to work off 12 of. And so some of the account information 13 may be in the Karma software that's owned 14 by AT&T.</p> <p>15 Q. Okay. The sixth from the bottom, 16 it says score value change, 0 to 279. What 17 is score value and what does that mean?</p> <p>18 A. We use a vendor who helps us -- 19 it's a propensity to pay score. And so we 20 run our debts through -- by a vendor, I 21 guess, and they give us -- they score the 22 debt and return that score to us.</p> <p>23 Q. Okay. What is the significance</p>

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<p>1 of the scores, if you know?</p> <p>2 A. I don't know a lot about it. I 3 know that our operations system uses the 4 scores to determine which debts we should 5 focus on and which debts are likely not 6 collectible. So, for example, if someone 7 had recently filed bankruptcy, their score 8 would be very low. You know, if they had a 9 good credit history or propensity to pay, 10 the score may be higher.</p> <p>11 Q. Okay. So the higher the score, 12 the more likely collection would be 13 successful; is that sort of the summary?</p> <p>14 A. I believe that's how it works.</p> <p>15 Q. Okay. All right. Because I saw 16 through this, it changes up and down a lot 17 and I wasn't sure how that worked. Am I 18 understanding you're not exactly 100 19 percent sure how that algorithm works as 20 well, or can we talk about that?</p> <p>21 A. I'm not familiar with the 22 algorithm. I believe it's like a credit 23 score where the CRAs are very secretive</p>	<p>1 is here at 1/4/21 at 5:59:27 p.m.? 2 A. Live line is showing that 3 information was received from the creditor 4 and updated into our system.</p> <p>5 Q. Okay. Do you know what that 6 information is, or do I need to scroll up?</p> <p>7 A. Portfolio is U-verse. I don't 8 know what PR means for channel.</p> <p>9 Q. Okay. All right. Moving up to 10 ICS 8. Do you know what this means at the 11 bottom here at 6:17:39, OCA name, AFNI?</p> <p>12 A. I believe it means that the debt 13 was previously placed with another agency 14 called AFNI.</p> <p>15 Q. Okay. All right. And the same 16 with FCS, would that have been a different 17 agency as well?</p> <p>18 A. I believe so.</p> <p>19 Q. All right. It looks like there's 20 some letters or at least a letter request, 21 score value is changing, which I know we 22 talked about we're not sure precisely what 23 that is. We move up. It looks like there</p>
<p>1 about how the number is generated, what the 2 formula is.</p> <p>3 Q. Sure.</p> <p>4 A. It's proprietary information that 5 we don't have. We just understand that 6 it's a propensity to pay scoring model.</p> <p>7 Q. That's fine. I was just curious 8 about it, but I think that's good enough 9 for our purposes today. This was a 10 consumer debt, was it not?</p> <p>11 MR. GOLDEN: Form.</p> <p>12 A. I believe so, yes.</p> <p>13 Q. Okay. I just say that because 14 she's referred to as consumer consistently 15 in here. Is that your understanding?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. All right. Let me move up 18 a little more. It looks like as we go to 19 the top half of ICS 9, it looks like there 20 are attempts to start calling and letters 21 sent. Does that appear to be correct?</p> <p>22 A. Yes.</p> <p>23 Q. Do you know what live line update</p>	<p>1 are attempts to collect or call at least. 2 There's an answering machine and no contact 3 on two different numbers. Am I reading 4 that correctly?</p> <p>5 A. Yes, two different attempts.</p> <p>6 Q. Yes, ma'am. And then there's a 7 viewed by Casi Quinonez. Is there any 8 significance there, or is she the person 9 that was working and dialing at this point?</p> <p>10 A. It looks like she viewed the 11 account, but it -- my understanding is she 12 may have viewed the account in relation to 13 the attempt at 9:47 on January 7. It looks 14 like a one-second call, so I would assume 15 the call wasn't connected.</p> <p>16 Q. I got you.</p> <p>17 A. But it was such a short call. 18 There's no account update. My 19 understanding is there's no contact -- 20 there's nothing to update.</p> <p>21 Q. Understood. All right. If we 22 move up to ICS 7, it looks like more 23 attempts to call and then score values</p>
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<p>1 change again; is that fair?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. It looks like more</p> <p>4 attempts to call as we go through the</p> <p>5 middle of January of '21. Does that seem</p> <p>6 accurate to you?</p> <p>7 A. Yes.</p> <p>8 Q. All right. And then if we move</p> <p>9 on, more calls. Move to ICS 6. Again,</p> <p>10 more attempts to call and score date</p> <p>11 changes; is that fair?</p> <p>12 A. Yes.</p> <p>13 Q. 2/1/21, it looks like another</p> <p>14 letter was requested to be sent?</p> <p>15 A. Yes.</p> <p>16 Q. Sorry. We have a fire truck</p> <p>17 going by. Okay. And then the next one I'm</p> <p>18 curious about, if we go up here, current</p> <p>19 linked debt phase, state ID changed. Is</p> <p>20 that internal recordkeeping?</p> <p>21 A. Yes.</p> <p>22 Q. And then any significance to</p> <p>23 working team changed from AT&T to corporate</p>	<p>1 to corporate pre-litigation. So I guess</p> <p>2 that's just another phase; is that right?</p> <p>3 A. That's part of the same phase.</p> <p>4 Q. Okay. Got you. And then any</p> <p>5 significance here, collector assigned</p> <p>6 changed? I assume that's internal</p> <p>7 notations?</p> <p>8 A. Correct.</p> <p>9 Q. And then working team changed</p> <p>10 from corporate litigation to AT&T warehouse</p> <p>11 house, do you know what that means?</p> <p>12 A. It looks like to the extent it</p> <p>13 was in the litigation phase, it was there</p> <p>14 for a few seconds and then just went into a</p> <p>15 warehouse phase. So I'm not sure that any</p> <p>16 work effort was done in pre-litigation. It</p> <p>17 may have just kind of moved to that phase</p> <p>18 very quickly and then went to the warehouse</p> <p>19 phase.</p> <p>20 Q. Got you. Got you. Okay. So</p> <p>21 then again, if we move up, it looks like an</p> <p>22 internal note, working team changed to</p> <p>23 U-verse seconds phase. And given the time,</p>
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<p>1 attorney referral?</p> <p>2 A. If you could, scroll up a little</p> <p>3 bit more.</p> <p>4 Q. Yes, ma'am. You want me to keep</p> <p>5 going?</p> <p>6 A. So, no, it's enough. Once we</p> <p>7 have exhausted collections, so we have made</p> <p>8 a certain number of phone attempts that</p> <p>9 have been unanswered, we have sent a</p> <p>10 certain number of letters, then the next</p> <p>11 phase in our collection strategy is to move</p> <p>12 it to our internal corporate attorney</p> <p>13 referral representative, whose name is Eric</p> <p>14 Anderson. He does --</p> <p>15 Q. Right there?</p> <p>16 A. Yes. He does end -- really end</p> <p>17 of intensive collection, reach out to try</p> <p>18 one more time to contact the consumer.</p> <p>19 Q. Okay.</p> <p>20 A. So that's just showing it moving</p> <p>21 to that phase.</p> <p>22 Q. Okay. I'll move back up. It</p> <p>23 looks like it is referred. Then it's sent</p>	<p>1 it may have just gone through several</p> <p>2 phases very quickly; is that fair?</p> <p>3 A. Correct.</p> <p>4 Q. All right. And then it looks</p> <p>5 like -- what does this credit monitor, add</p> <p>6 monitoring mean? ICS 5 -- excuse me. Just</p> <p>7 so I'm clear on the record, ICS 5 at</p> <p>8 2/19/21, 11:59:59.</p> <p>9 A. We use a vendor who just -- that</p> <p>10 monitors credit scores or credit</p> <p>11 information. And so if something changes,</p> <p>12 like a bankruptcy, we will be immediately</p> <p>13 notified. Really, it's more of an inactive</p> <p>14 phase where the vendor is kind of</p> <p>15 monitoring the credit history for any</p> <p>16 changes, but it's more an inactive</p> <p>17 collections phase.</p> <p>18 Q. Okay. And then these batch</p> <p>19 processing, is this all internal stuff</p> <p>20 again?</p> <p>21 A. Correct.</p> <p>22 Q. Now, we're moving on to ICS 4.</p> <p>23 Again, batch processing simply is internal</p>

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<p style="text-align: right;">Page 49</p> <p>1 things; right?</p> <p>2 A. Correct.</p> <p>3 Q. We move up. It looks like more</p> <p>4 attempts to call are made February 20th and</p> <p>5 23rd of 2021; is that right?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Now, we get to March 3rd,</p> <p>8 2021, at 9:54 p.m. Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. All right. And there's an</p> <p>11 account note, and Ms. Barbara Hauke's name</p> <p>12 is there; right?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. According to these notes,</p> <p>15 it looks like she called and spoke with Ms.</p> <p>16 Dorsey; is that right?</p> <p>17 A. It looks like Ms. Dorsey called</p> <p>18 and spoke with Barbara Hauke.</p> <p>19 Q. Okay. So Ms. Dorsey called in.</p> <p>20 Thank you for that. And I think I got it</p> <p>21 wrong. It looks like it's 2:09:54 p.m.,</p> <p>22 not 9:54 p.m.; is that right?</p> <p>23 A. Correct.</p>	<p style="text-align: right;">Page 51</p> <p>1 service at that time, never had service,</p> <p>2 not available in area at that time. And</p> <p>3 then a rep ends the call by verifying her</p> <p>4 address and email and phone number.</p> <p>5 Q. All right. And then above that,</p> <p>6 it looks like verified with a telephone</p> <p>7 number and then she changes the dispute</p> <p>8 flag from not disputed to, yes, disputed;</p> <p>9 is that correct?</p> <p>10 A. Correct.</p> <p>11 Q. Okay. And then if we move up a</p> <p>12 little more, the bill-to address reason is</p> <p>13 changed, I guess, based on the verification</p> <p>14 of the phone call; would that be correct?</p> <p>15 A. I'm sorry. Can you ask that</p> <p>16 again?</p> <p>17 Q. Of course. It says updated --</p> <p>18 and I will highlight it -- bill-to address</p> <p>19 reason changed, nothing to verify it. I</p> <p>20 assume that's because it was verified on</p> <p>21 the telephone where it says verified addy?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. All right. So we talked</p>
<p style="text-align: right;">Page 50</p> <p>1 Q. Okay. Y'all weren't calling her</p> <p>2 at 10:00 at night, I hope; right?</p> <p>3 A. No.</p> <p>4 Q. Or she wasn't calling you, I</p> <p>5 hope, rather. Can you translate the</p> <p>6 shorthand right here in 3/3/21 at 9:54 p.m.</p> <p>7 that says account note for me?</p> <p>8 A. Sure. It starts with 20560.</p> <p>9 That indicates the number that she called</p> <p>10 in from.</p> <p>11 Q. Okay.</p> <p>12 A. I don't know what the redacted</p> <p>13 part is.</p> <p>14 Q. Sure.</p> <p>15 A. If I look at the account note</p> <p>16 above, I would assume that it's just the</p> <p>17 end of the complete phone number, the last</p> <p>18 four of the phone number perhaps.</p> <p>19 Q. Okay.</p> <p>20 A. VIC is verified the identity of</p> <p>21 the consumer. MM is mimi Miranda, and then</p> <p>22 it says Ms. disputes. So she is disputing</p> <p>23 the account. AT&T could not provide</p>	<p style="text-align: right;">Page 52</p> <p>1 about I.C. System recorded this telephone</p> <p>2 call; is that right?</p> <p>3 A. Yes.</p> <p>4 Q. And I know that you haven't</p> <p>5 listened to it in the very recent past, but</p> <p>6 you have heard that call, have you not?</p> <p>7 A. Correct.</p> <p>8 Q. In the call, Ms. Hauke tells Ms.</p> <p>9 Dorsey I.C. System does not credit report.</p> <p>10 Do you recall her saying that in the call?</p> <p>11 A. I recall her saying something to</p> <p>12 that effect.</p> <p>13 Q. But I.C. System does credit</p> <p>14 report debts, does it not?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. In fact, I.C. System</p> <p>17 reported Ms. Dorsey's debt to TransUnion;</p> <p>18 is that correct?</p> <p>19 A. I believe that's correct.</p> <p>20 Q. Okay. Sorry. One second. It</p> <p>21 sounds like the Birmingham firefighters are</p> <p>22 busy this morning. All right. According</p> <p>23 to the notes and your memory of the call,</p>

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<p>1 Ms. Dorsey told Ms. Hauke AT&T couldn't 2 provide her with U-verse service and that 3 she never had the service because it wasn't 4 available is at least what she said; is 5 that right?</p> <p>6 A. I believe she said something like 7 that.</p> <p>8 Q. And that's reflected in the notes 9 here, is it not?</p> <p>10 A. Correct.</p> <p>11 Q. Does I.C. System dispute that 12 AT&T U-verse internet service was not 13 available at her home?</p> <p>14 MR. GOLDEN: Form.</p> <p>15 A. I am not aware of where AT&T 16 provides internet service.</p> <p>17 Q. Okay. So, again, does I.C. 18 System have any reason to dispute that or 19 does it not know either way?</p> <p>20 A. Well, the fact that AT&T placed 21 the debt, we rely on that as the 22 representation that the debt is validly due 23 and owing.</p>	<p>1 call?</p> <p>2 A. I don't recall.</p> <p>3 Q. Do the notes -- and I can scroll 4 up some, sorry, if you need me to. For 5 3/3/21, I'm looking to see if there's 6 anything else other than I.C. -- yeah. So 7 it looks like it's verified information 8 that Ms. Hauke viewed the account. Does 9 that look correct and that it was updated?</p> <p>10 A. Correct.</p> <p>11 Q. And then the next is March 17th 12 of '21 when another letter was requested. 13 It looks like a settlement offer letter; is 14 that right?</p> <p>15 A. Yes.</p> <p>16 Q. All right. Do the notes indicate 17 that Ms. Hauke or anyone at I.C. System 18 contacted AT&T to see if what Ms. Dorsey 19 was saying about the U-verse service not 20 being available was true?</p> <p>21 A. The dispute would have been 22 updated back to AT&T through our collection 23 software.</p>
<p>1 Q. I understand that. But I.C. 2 System has no independent knowledge as to 3 whether U-verse service is available at Ms. 4 Dorsey's address or not, does it?</p> <p>5 A. I'm not sure. I would tell you 6 that because they placed the account, we 7 would assume that they did provide the 8 service.</p> <p>9 Q. Okay. But that's just an 10 assumption y'all made because they placed 11 the account; right?</p> <p>12 A. Well, they represent and warrant 13 to I.C. System that they only place debts 14 that are validly due and owing. So it's 15 our experience that when they realize maybe 16 the service wasn't provided or that the 17 debt is inaccurate or not due and owing, 18 they will recall the debt or pull it out of 19 our active collection inventory. That 20 didn't happen here at this time.</p> <p>21 Q. Okay. All right. Ms. Dorsey -- 22 do you recall Ms. Dorsey saying that she 23 was not going to pay the debt on the phone</p>	<p>1 Q. All right. And what would that 2 have looked like? Would they have gotten 3 the same information we're looking at here, 4 or does it -- how is that done?</p> <p>5 A. They would have gotten something 6 similar just saying that she disputed that 7 the service was provided.</p> <p>8 Q. All right. Other than sending 9 that notification, is there any instance 10 that you can see in the notes or that 11 you're aware of that anyone at I.C. System 12 contacted AT&T to ask if the service was 13 available or not?</p> <p>14 A. Well, I should back up by saying 15 that we had previously sent this consumer 16 an initial notice, 1692G notice. And 17 within the 30-day validation period after 18 receiving that notice, she had not 19 contacted I.C. System to dispute the debt 20 or otherwise request information. Had she 21 done so, the debt would go into an 22 answer-required status where AT&T would 23 have to provide additional validation of</p>
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<p style="text-align: right;">Page 57</p> <p>1 the debt in order for collections to 2 continue. So had she disputed within the 3 FDCPA's three-day time period, the account 4 would have been handled differently. She 5 did not. And so that's just an additional 6 reason why I.C. System relies on the 7 validity of the debt.</p> <p>8 To answer your question, the 9 dispute would have been communicated to 10 AT&T had she, you know, provided something 11 in writing or a fraud packet or a police 12 report. That would have also been an 13 additional investigation. But here, she 14 just said she didn't receive the service. 15 AT&T said she did. And so that's kind of 16 where this leaves off.</p> <p>17 Q. I understand that a letter was 18 sent and I.C. System's position is that she 19 didn't dispute it within the 30 days of the 20 date of the letter. I understand that. 21 However, she does dispute it March the 3rd, 22 2021, does she not?</p> <p>23 A. Correct. And even though it was</p>	<p style="text-align: right;">Page 59</p> <p>1 position that unless she disputes it within 2 those 30 days, I.C. System isn't going to 3 request additional validation?</p> <p>4 MR. GOLDEN: Form.</p> <p>5 A. Well, not necessarily. I'm just 6 telling you that if she had provided a 7 written dispute within the first 30 days, 8 our requirements under the FDCPA are 9 different than if she calls in outside of 10 that validation period and provides a 11 verbal dispute, which is what she did here. 12 Here, because she provided a verbal dispute 13 and just said, I didn't get the services, 14 we communicated that dispute back to AT&T, 15 who I believe received the dispute. They 16 didn't recall the debt or withdraw the 17 debt, so we continued to collect.</p> <p>18 Q. Okay. Let me ask you this: As 19 part of her job, if Ms. Hauke had wanted to 20 for whatever reason, is she permitted to 21 contact AT&T to verify what Ms. Dorsey was 22 saying about not having the U-verse 23 service?</p>
<p style="text-align: right;">Page 58</p> <p>1 only a verbal dispute, we do update our 2 account records to reflect the dispute and 3 then communicate that to the credit 4 reporting agencies and to the creditor.</p> <p>5 Q. Sure. When you said that if she 6 disputes it within the 30-day time period, 7 that triggers a request for additional 8 validation; is that right?</p> <p>9 A. Correct.</p> <p>10 Q. She disputed it here. Was any 11 request for additional validation made in 12 response to her dispute of the debt 13 verbally on March 3rd, 2021?</p> <p>14 A. No. We didn't require any to 15 continue our collection activity.</p> <p>16 Q. Why would that be? What's the 17 significance within the 30 days, rather 18 than when she finally calls in and disputes 19 it? She doesn't -- or you don't request 20 additional validation?</p> <p>21 A. The FDCPA.</p> <p>22 Q. Okay. So you're basing the 23 policy on the FDCPA, and it's I.C. System's</p>	<p style="text-align: right;">Page 60</p> <p>1 MR. GOLDEN: Form.</p> <p>2 A. She is not prohibited from 3 contacting them, but based on the nature of 4 this dispute, I don't think there was any 5 reason to.</p> <p>6 Q. I understand. But had she wanted 7 to, how is that typically done? Is it a 8 phone call? Is it through the software? 9 How does that work?</p> <p>10 A. There's a variety of ways that we 11 can contact AT&T. She could have escalated 12 it to her supervisor, who would have 13 requested the information. Our consumers 14 affairs group can request the information. 15 If we receive a dispute in writing, our 16 correspondence team or our consumer affairs 17 team can contact AT&T. We have account 18 managers who can contact AT&T. So if the 19 dispute warrants additional communication, 20 we certainly have a number of ways that we 21 can do that.</p> <p>22 Q. If that had happened, if someone 23 at I.C. System had contacted AT&T to ask if</p>

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<p style="text-align: right;">Page 61</p> <p>1 what Ms. Dorsey was saying was true, would 2 that be reflected in the account notes? 3 A. Yes. 4 Q. Are all contacts with the 5 creditor reflected here in the account 6 notes as best you know? 7 A. No. I believe that there are 8 additional communications that may occur 9 that are in our collections software that 10 aren't necessarily printed on the notes. 11 Q. Had -- 12 A. Excuse me. We send combined 13 messages to our clients. I think typically 14 when a rep sends a combined message, they 15 would indicate CM and then 38 or 42 or 16 whatever the combined message. It's 17 usually kind of format text. Here, there 18 is no indication that a combined message 19 was sent. 20 Q. I got you. And you also said 21 that AT&T would have been notified that Ms. 22 Dorsey disputed the debt. Did I hear you 23 correct?</p>	<p style="text-align: right;">Page 63</p> <p>1 information or does I.C. System 2 independently try to verify if a debt is 3 owed or not? 4 A. I.C. System relies on the 5 creditor and the consumer to provide that 6 information. 7 Q. Okay. If what Ms. Dorsey said 8 was true, that she had never had the 9 service and that it was not ever available 10 at her home, does I.C. System agree that 11 she wouldn't owe AT&T money for that 12 service she never got? 13 MR. GOLDEN: Form. 14 A. I.C. System isn't the FBI. We're 15 not really in a position to make that 16 determination. So if she provided proof to 17 I.C. System that she didn't owe the debt to 18 AT&T, we would rely on that evidence. But 19 here, we just have a short phone call and 20 nothing more. So we communicated that 21 dispute back to AT&T, and they continued to 22 verify the accuracy of the debt. 23 Q. If we can look up -- let's see</p>
<p style="text-align: right;">Page 62</p> <p>1 A. Correct. The dispute was 2 updated. You can see there's an entry, I 3 think, that said dispute from no to yes. 4 And so that dispute flag is communicated to 5 AT&T and to the CRAs. 6 Q. All right. So the notes don't 7 show a specific contact to AT&T. But if I 8 read disputed flag change no to yes, is it 9 I.C. System's testimony that AT&T would 10 have been notified in that process? 11 A. Yes. The dispute is updated in 12 that Karma system, that live line file. 13 There's a communication back to AT&T. They 14 would've been notified at that time. 15 Q. All right. I.C. System agrees it 16 can't attempt to collect debts that are not 17 actually owed; is that right? 18 MR. GOLDEN: Form. 19 A. If I.C. System receives 20 information that a debt is not actually due 21 and owing, we will stop collections. 22 Q. Got you. Is I.C. System reliant 23 on the creditor to provide that sort of</p>	<p style="text-align: right;">Page 64</p> <p>1 here. All right. Do you see October 6, 2 2021, at around 6:39 in the morning? 3 A. Yes. 4 Q. All right. There are some 5 indications here. There are two blocks for 6 that day or two entries. The first is 7 updated. The second is ACDV. Can you 8 explain what happened in these two blocks 9 here or entries for October the 6th, 2021? 10 A. Sure. It looks like we received 11 an ACDV from TransUnion, and the consumer 12 claimed that she had paid the debt. Our 13 system reviewed the account information 14 from AT&T to see that the debt had not been 15 paid, and we provided that information back 16 to the CRA. 17 Q. I haven't seen any letter or 18 anything like that. Do you know how that 19 dispute was communicated to TransUnion? 20 A. Yes. It's through the e-OSCAR. 21 There's a file transfer process. So we 22 receive the ACDV on a file, and then we 23 communicate back through an electronic file</p>

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<p style="text-align: right;">Page 65</p> <p>1 exchange.</p> <p>2 Q. Sure. And I understand that, but</p> <p>3 I'm asking if you know. Do you know how</p> <p>4 Ms. Dorsey communicated her dispute to</p> <p>5 TransUnion that's reflected here, that was</p> <p>6 investigated on October the 6th?</p> <p>7 A. I do not know.</p> <p>8 Q. Okay. I don't either. That's</p> <p>9 why I was wondering. Okay. If we go back,</p> <p>10 the next set of entries looks like October</p> <p>11 the 21st. It looks like more attempts to</p> <p>12 contact Ms. Dorsey?</p> <p>13 A. Yes.</p> <p>14 Q. And then it looks like more</p> <p>15 contacts through October 26th, 29th,</p> <p>16 November 1st. Does that look right?</p> <p>17 MR. GOLDEN: Form.</p> <p>18 A. It looks like we made a number of</p> <p>19 attempts, and she never answered.</p> <p>20 Q. Got you. And then finally on</p> <p>21 November 1st, 2021, the first entry here on</p> <p>22 ICS 3, there's an account note. And Lori</p> <p>23 Bagniewski and Barbara Hauke are both</p>	<p style="text-align: right;">Page 67</p> <p>1 phone number appear as the beginning of the</p> <p>2 entry, that indicates it's an inbound call</p> <p>3 from that phone number ending in the last</p> <p>4 four digits.</p> <p>5 Q. Okay. Let's see here. All</p> <p>6 right. So both communications, it looks</p> <p>7 like the best we can tell, Ms. Dorsey</p> <p>8 called in; is that right?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. We'll move on up. This is</p> <p>11 still November 1st, 2021, around the same</p> <p>12 time. Can you tell me what's going on in</p> <p>13 this very first or bottom block here when</p> <p>14 it says updated November 1st, 2021, at</p> <p>15 1:44:03 p.m.?</p> <p>16 A. It looks like it's moving out of</p> <p>17 Barbara Hauke's work queue and into Lori</p> <p>18 Bagniewski's queue.</p> <p>19 Q. Okay. At the bottom, it says</p> <p>20 last event changed from verify/CBR</p> <p>21 investigation complete to dispute, answer</p> <p>22 not required. What does that mean?</p> <p>23 A. It's just indicating that there</p>
<p style="text-align: right;">Page 66</p> <p>1 written here. Can you translate what</p> <p>2 happened here on November the 1st, 2021, at</p> <p>3 1:44 in the afternoon?</p> <p>4 A. Sure. So the redacted part, I'm</p> <p>5 assuming is the last four digits of her</p> <p>6 phone number, just to identify that it's an</p> <p>7 inbound call. VIC is verify the identity</p> <p>8 of consumer. MM is mini Miranda. Ms. said</p> <p>9 was never installed in home, service was</p> <p>10 never installed in home. October 2018, I'm</p> <p>11 assuming is the service date. Client says</p> <p>12 was to remove bill. So I think she's</p> <p>13 claiming that AT&T said they would not bill</p> <p>14 her. Client services are not available in</p> <p>15 her area. It looks like our rep offered</p> <p>16 her a settlement to take care of this. Ms.</p> <p>17 said not paying. And we verified her</p> <p>18 address, phone number, and email.</p> <p>19 Q. Does it reflect -- do you know,</p> <p>20 did she call in here, she being Ms. Dorsey,</p> <p>21 or did she answer a call from Ms.</p> <p>22 Bagniewski? Do you know?</p> <p>23 A. Because the first four of the</p>	<p style="text-align: right;">Page 68</p> <p>1 was another inbound phone call disputing</p> <p>2 the debt. And not required means it's a</p> <p>3 dispute that's outside of the FDCPA</p> <p>4 validation period.</p> <p>5 Q. Okay. Looking again, it looks</p> <p>6 like internal notes about assigning</p> <p>7 collector and what phase; is that right?</p> <p>8 A. Yes.</p> <p>9 Q. That's February 20, 2022. All</p> <p>10 right. So if we look at the top of ICS 2,</p> <p>11 it looks like working team changed, AT&T WH</p> <p>12 U-verse, CW phase to AT&T warehouse house.</p> <p>13 Is that meaning that the debt -- or the</p> <p>14 account is being warehoused again?</p> <p>15 A. It's just -- yes. It's just</p> <p>16 moving to a different phase of collections.</p> <p>17 Q. And then what's the significance</p> <p>18 of this top entry, last event changed from</p> <p>19 dispute, answer not required to new</p> <p>20 business? What is that all about?</p> <p>21 A. If you go up a little bit, I</p> <p>22 believe this is just all related to moving</p> <p>23 to a different phase.</p>

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<p style="text-align: right;">Page 69</p> <p>1 Q. Okay. Okay. Got you. 2/20/22, 2 it looks like closed debt numbers, credit 3 monitor, return debt numbers, closed debt 4 numbers, status changed from active to 5 retained, the last event from new business 6 to retained collections. What is the 7 significance of those five entries there at 8 the bottom of ICS 1?</p> <p>9 A. Again, this is all part of that 10 move to a different phase. Routine 11 collections is an inactive collection phase 12 where the account is still placed with I.C. 13 System, but it's not in active collections.</p> <p>14 Q. Okay. We saw in the notes that 15 on November the 1st, 2021, Ms. Dorsey 16 called in a second time and, again, said 17 that AT&T did not offer U-verse internet 18 service at her home and she didn't have the 19 service. Did you see that in the notes? 20 And I can go back, if you would like.</p> <p>21 A. I don't recall exactly what it 22 says, but I believe you're stating it 23 right.</p>	<p style="text-align: right;">Page 71</p> <p>1 being updated.</p> <p>2 Q. I got you. But what I'm saying 3 is there's no indication here that there 4 was any specific contact with AT&T where 5 the goal was to verify or determine if what 6 Ms. Dorsey was saying was correct; am I 7 right about that?</p> <p>8 A. Well, we would have communicated 9 the dispute information back to AT&T.</p> <p>10 Q. Okay. And then you're relying on 11 AT&T to respond, I guess?</p> <p>12 A. Yes. If the information -- if 13 they believe that she didn't have service 14 or the debt is not due and owing, then the 15 process is they would recall the debt from 16 our inventory.</p> <p>17 Q. Okay. So let's go back up, if we 18 can, to November the 20th. And I'm going 19 to pull up what I'm going to mark as 20 Exhibit 3, if you'll bear with me for just 21 a minute. Okay.</p> <p>22</p> <p>23</p>
<p style="text-align: right;">Page 70</p> <p>1 Q. Sure. I'll scroll back down so 2 we're on the same page. All right. This 3 top entry on ICS 3, client says to remove 4 bill, client services are not available in 5 her area, and says never installed at home. 6 Does that indicate to you that that's what 7 Ms. Dorsey was communicating to Ms. 8 Bagniewski?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Is there any indication 11 after November the 1st, 2021, here that Ms. 12 Bagniewski or anyone at I.C. System 13 contacted AT&T to see if what Ms. Dorsey 14 was saying about the service not being 15 available was correct?</p> <p>16 A. Well, we are constantly 17 communicating information back and forth 18 with AT&T. So through our electronic file 19 transfer system, I believe the dispute 20 would have been re-communicated to AT&T. 21 And they also are sending us updated files 22 with balance adjustments, payment 23 information, so the files are constantly</p>	<p style="text-align: right;">Page 72</p> <p>1 (Plaintiff's Exhibit 3 was 2 marked for identification.)</p> <p>3</p> <p>4 Q. All right. Ma'am, I'm showing 5 you what I'm going to mark as Exhibit 3 to 6 your deposition. And I will represent 7 these are the I.C. System's answers to my 8 client's interrogatories. Have you seen 9 these before today?</p> <p>10 A. Yes.</p> <p>11 Q. If we look at interrogatory 12 number three -- and let me scroll through 13 it so you can see. All right. Number 14 three asked about facts and actions taken 15 with regard to the plaintiff's I.C. System 16 account. And as part of the response, it 17 says in the first paragraph, defendant's 18 only contact with the creditor or potential 19 creditor regarding the plaintiff involved 20 the AT&T U-verse communication of 21 information related to the account on 22 December the 12th, 2020, and when defendant 23 closed the account February 20th of 2022.</p>

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<p style="text-align: right;">Page 73</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Do we know if the account was</p> <p>4 placed on the 12th of December or the 28th,</p> <p>5 or do you know either way?</p> <p>6 A. I would have to look back at the</p> <p>7 ICS history at the very bottom. It would</p> <p>8 have the placement date.</p> <p>9 Q. I got you. And then it says,</p> <p>10 defendant closed the account February 20th</p> <p>11 of 2022; is that right?</p> <p>12 A. That's what this says.</p> <p>13 Q. Okay. Based on those notes, and</p> <p>14 I can pull them back up, did the account</p> <p>15 get closed on February 20th, 2022?</p> <p>16 A. Can we look at the notes?</p> <p>17 Q. Yeah. Let me do that. And I can</p> <p>18 scroll up or down. You just tell me what</p> <p>19 you want to look at.</p> <p>20 A. It looks like on February 20th,</p> <p>21 2022, it moved to retained collections. I</p> <p>22 don't believe that it was closed.</p> <p>23 Q. Okay. So the interrogatory</p>	<p style="text-align: right;">Page 75</p> <p>1 Q. Okay. All right. So as of</p> <p>2 February 20th, 2022, it's fair to say I.C.</p> <p>3 System was not making active efforts to</p> <p>4 collect the account?</p> <p>5 A. Yes.</p> <p>6 Q. All right. Would you agree with</p> <p>7 me that when asking about -- in</p> <p>8 interrogatory number three, asking about</p> <p>9 communications, this indicates at least</p> <p>10 that the only contact involving the AT&T</p> <p>11 U-verse communication was when the account</p> <p>12 was placed and when it says closed, but</p> <p>13 moved to inactive. Am I understanding that</p> <p>14 right?</p> <p>15 A. Yes. I think this answer is</p> <p>16 interpreting communications to be</p> <p>17 communications other than the file</p> <p>18 transfers that are happening kind of</p> <p>19 routinely throughout the placement.</p> <p>20 Q. Okay. And that's what I was</p> <p>21 going to ask you. I didn't see that in</p> <p>22 here. So that was just inadvertently left</p> <p>23 out or --</p>
<p style="text-align: right;">Page 74</p> <p>1 response is inaccurate or incorrect, or</p> <p>2 what would your comment be?</p> <p>3 A. I don't believe that the word</p> <p>4 closed is the right word. I think that it</p> <p>5 should say moved to inactive collections on</p> <p>6 February 20th.</p> <p>7 Q. Explain to me what inactive</p> <p>8 collections is.</p> <p>9 A. Inactive collections means we're</p> <p>10 no longer making phone calls or sending</p> <p>11 letters.</p> <p>12 Q. All right. When it's inactive,</p> <p>13 is it returned to AT&T?</p> <p>14 A. No. It goes into a retained</p> <p>15 collection status. So it's still in our</p> <p>16 inventory. We're just not actively working</p> <p>17 it.</p> <p>18 Q. Okay. What has to occur for --</p> <p>19 or what occurred that made this go to</p> <p>20 inactive collections, anything</p> <p>21 specifically, or was it just a function of</p> <p>22 time or what?</p> <p>23 A. It was a function of time.</p>	<p style="text-align: right;">Page 76</p> <p>1 A. Yes.</p> <p>2 Q. But we don't -- looking at the</p> <p>3 notes, do we know when those communications</p> <p>4 were made, or is that an automatic process?</p> <p>5 A. It's a process that's constantly</p> <p>6 happening behind the scenes. Those files</p> <p>7 are being transferred every day, multiple</p> <p>8 times through the days.</p> <p>9 Q. When the account went to inactive</p> <p>10 status, was AT&T notified of that</p> <p>11 transition or change?</p> <p>12 A. I'm not sure.</p> <p>13 Q. Okay. So we don't know if AT&T</p> <p>14 was told the account is inactive or not?</p> <p>15 A. I'm not sure.</p> <p>16 Q. Okay. This indicates -- and if</p> <p>17 you don't know, it's fine. Just tell me.</p> <p>18 This response indicates there was some</p> <p>19 communication to AT&T on February 20th,</p> <p>20 2022. Do you know what that is one way or</p> <p>21 the other?</p> <p>22 A. I would have to look at the</p> <p>23 account notes again.</p>

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<p>1 Q. All right. Let me pull those 2 back up. And, again, they cover two pages, 3 so I'm happy to scroll up or down as you 4 wish.</p> <p>5 A. Go down just a little bit, 6 please.</p> <p>7 Q. Yes, ma'am.</p> <p>8 A. Yeah. My guess is, on February 9 20th, there was a communication to AT&T 10 that it was going into retained 11 collections. But, again, that would have 12 been a standard communication with our file 13 transfer process. So I'm not sure why -- I 14 don't believe that calling out February 15 20th, 2022, is the best response to that 16 interrogatory.</p> <p>17 Q. Okay. Do you know, did I.C. 18 System continue to report the AT&T U-verse 19 account to TransUnion after February 20th, 20 2022?</p> <p>21 A. I believe so.</p> <p>22 Q. The reports are made monthly, are 23 they not?</p>	<p>1 depends on the account. 2 Q. With this account, it's not 3 reflected when it was being reported in the 4 notes, is it? 5 A. I think if you looked at the ICS 6 summary, it usually says first credit 7 reported and then it has the date at the 8 top of that page. 9 Q. Okay. All right. And I think I 10 got something that looked like that was 11 admittedly very, very blurry. 12 MR. SEALS: Do you -- Mr. Golden, 13 do you happen to have that ICS summary 14 she's mentioning? 15 MR. GOLDEN: It will take me a 16 minute to go and find it and send it to 17 you. 18 MR. SEALS: I hate to waste 19 anybody's time, but if you don't mind, I 20 would very much appreciate it. 21 MR. GOLDEN: Okay. Let's take 22 like a five-minute break and let me find 23 it.</p>
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<p>1 A. The reports are made weekly. 2 Q. Weekly. All right. So do you 3 know or based on what we're looking at, was 4 this AT&T U-verse debt allegedly owed by 5 Ms. Dorsey being weekly reported to 6 TransUnion from December of 2020 all the 7 way through 2022? Do you know? 8 A. I can't tell from this document. 9 It wouldn't have been reported on the 10 placement date. There's a certain period 11 of time where we, you know, try to contact 12 the consumer, send letters. It doesn't get 13 reported on day one. 14 Q. I got you. When does it usually 15 start being reported after placement? 16 A. Usually not before 36 days, 17 sometimes 45 days, sometimes -- it really 18 just depends on the collection strategy 19 that's applied to the account. But I think 20 the earliest it would report would be 36 21 days. Some are much later. Healthcare 22 debt, we have to wait a lot longer to be 23 able to credit report. So really, it just</p>	<p>1 MR. SEALS: That's fine. And I'm 2 going to step out for just a moment. 3 4 (Break taken.) 5 6 Q. Ms. Dove, before we took that 7 break, we were discussing credit reporting 8 by I.C. System regarding Ms. Dorsey's 9 account. And your attorney was kind enough 10 to send over what looks like a fairly clear 11 version of a document that was previously 12 produced. I'm going to mark this as 13 Exhibit -- I believe I'm on four. 14 MR. SEALS: Jennifer, thumbs up? 15 Okay. This will be Exhibit 4, which will 16 sort of mess up some of the numbering I 17 have, but that's fine. That's between me 18 and Jennifer. 19 20 (Plaintiff's Exhibit 4 was 21 marked for identification.) 22 23 Q. What am I looking at right here</p>

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<p>1 in Exhibit 4?</p> <p>2 A. This is a screenshot of</p> <p>3 information in our collection software. So</p> <p>4 this is showing the information provided to</p> <p>5 the CRAs related to Ms. Dorsey's account.</p> <p>6 Q. And can you very briefly walk me</p> <p>7 through this and tell me exactly what I'm</p> <p>8 looking at right here?</p> <p>9 A. Sure. So if you start at the</p> <p>10 bottom --</p> <p>11 Q. Yes, ma'am.</p> <p>12 A. -- left-hand corner, you'll see</p> <p>13 under the activity date, that's telling you</p> <p>14 the date the information was actually</p> <p>15 communicated to the CRAs.</p> <p>16 Q. Okay.</p> <p>17 A. So this would indicate that the</p> <p>18 debt was first credit reported on February</p> <p>19 28th, 2021. If you move across the special</p> <p>20 comment, we reported debts with the AW</p> <p>21 code. That would be a natural disaster</p> <p>22 code. That was related to COVID.</p> <p>23 Q. Okay.</p>	<p>1 A. Yes. March 7, 2021, is when the</p> <p>2 dispute code was sent to the CRAs.</p> <p>3 Q. Right. And that, again, says AW,</p> <p>4 meaning it wasn't visible at least at that</p> <p>5 time due to COVID; correct?</p> <p>6 A. Yes.</p> <p>7 Q. All right. Then it moves up.</p> <p>8 The next entry is March 6th, 2022, update.</p> <p>9 It's marked as disputed. The AW code is</p> <p>10 missing. Does that mean it was at that</p> <p>11 point visible to creditors had they cared</p> <p>12 to look?</p> <p>13 A. Yes. And I just want to be</p> <p>14 clear. Our understanding is that it wasn't</p> <p>15 visible to creditors. I'm not entirely</p> <p>16 sure. It's kind of like the credit score.</p> <p>17 I'm not entirely sure how the CRAs do what</p> <p>18 they do.</p> <p>19 Q. That's perfectly fine. I don't</p> <p>20 know either. I appreciate that, and I</p> <p>21 think we're both sort of flying blind</p> <p>22 there. It says extract type, update on</p> <p>23 March 6th, 2022. Do you know if any</p>
Page 82	Page 84
<p>1 A. So when the debt had the AW code,</p> <p>2 our understanding is that it wasn't visible</p> <p>3 to creditors, but it was available to</p> <p>4 consumers. They could see it on the</p> <p>5 report, but it wasn't negatively impacting</p> <p>6 the score. And then if you move across,</p> <p>7 you can see the amount of the debt, \$151,</p> <p>8 first name, last name of the debtor. And</p> <p>9 if you move all the way over to the right,</p> <p>10 you can see that it was reported to</p> <p>11 Experian, Innovis, and TransUnion. And</p> <p>12 this debt was not reported to Equifax.</p> <p>13 Q. Okay. That makes sense. So</p> <p>14 very, very briefly, as I walk through this,</p> <p>15 it's first reported February 28th as you</p> <p>16 said. It has the natural disaster code, so</p> <p>17 it would not have been visible to</p> <p>18 creditors. It looks like the next time is</p> <p>19 March 7th, 2021, which is temporally</p> <p>20 related to that phone call where she called</p> <p>21 in and disputed it, and it looks like it's</p> <p>22 marked disputed on March 7th, 2021. Am I</p> <p>23 correct about that?</p>	<p>1 information was specifically updated, or</p> <p>2 would that have been the removal of that</p> <p>3 comment? Or do you know one way or the</p> <p>4 other?</p> <p>5 A. I believe the update was the</p> <p>6 removal of the code.</p> <p>7 Q. Okay. And then October 30th,</p> <p>8 2022, called with a request to delete;</p> <p>9 fair?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. All right. So you</p> <p>12 testified earlier that this is being</p> <p>13 reported or -- I don't want to paint you in</p> <p>14 the wrong light here. It may have been</p> <p>15 reported weekly. Looking at this, was it</p> <p>16 reported weekly or was it just reported on</p> <p>17 these specific dates in Exhibit 4?</p> <p>18 A. The file goes weekly.</p> <p>19 Q. Oh, okay.</p> <p>20 A. My understanding is that when the</p> <p>21 information changes, then there's an</p> <p>22 update.</p> <p>23 Q. Okay. Okay. I got you. So it</p>

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<p style="text-align: right;">Page 85</p> <p>1 was being reported weekly, but this 2 reflects when any data was updated or 3 changed in some way; fair?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. All right. That's fine. 6 That makes sense to me. Okay. I'm going 7 to move back to Exhibit 2, if I can. Do 8 you see -- and this is -- let's see here. 9 Do you see May 23rd, 2022, at 6:48:01, 10 there are two entries?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. It appears to me, and 13 correct me if I'm wrong, that at that date 14 and time, I.C. System received an ACDV from 15 TransUnion. Is that what it appears to 16 you?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And I.C. System is aware 19 this is the dispute that's made the basis 20 of Ms. Dorsey's Fair Credit Reporting Act 21 claim? Do you understand that?</p> <p>22 A. I believe that's true.</p> <p>23 Q. I don't think we made any claim</p>	<p style="text-align: right;">Page 87</p> <p>1 Q. Okay. It also says Code 118, 2 balance/past due amount/verify. Do you see 3 that?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Do I take that to read 6 that TransUnion communicated in the ACDV 7 that the dispute was assigned codes, 1 for 8 not mine and 118 regarding balance past 9 due?</p> <p>10 A. I believe that's correct.</p> <p>11 Q. Verify response, 23 CC, debt 12 numbers, and then there's a number kind of 13 cut off there. What does all that mean?</p> <p>14 A. The verify response is the code 15 that we sent back. So the 23 is to verify 16 that the information was correct.</p> <p>17 Q. And debt numbers is just that 18 internal recordkeeping; am I right?</p> <p>19 A. I believe so.</p> <p>20 Q. Okay. So if I'm reading this 21 right, if I'm translating it right, ACDV 22 received, had Code 001 and Code 118, both 23 of those items of information were verified</p>
<p style="text-align: right;">Page 86</p> <p>1 regarding -- there were two disputes. It 2 looks like one prior, back in '21. We 3 haven't made any claims related to that. I 4 just want to be clear about that. So I'm 5 asking about the dispute. We'll talk about 6 the dispute, I mean primarily this one in 7 May of '22. Is that okay?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. All right. So the bottom 10 says last event changed from retained 11 collections to verify, CBR investigation 12 complete. What does that mean?</p> <p>13 A. That means that we received the 14 ACDV. I can tell by this update it was an 15 ACDV from TransUnion in which the consumer 16 claimed the debt was not hers. And so we 17 took the information in the ACDV and 18 compared it to the information in ICE and 19 verified that the name -- the data points 20 are name, address, in this case, social 21 security number, that it all matched and 22 that it was, in fact, her debt and verified 23 that information back to the CRAs.</p>	<p style="text-align: right;">Page 88</p> <p>1 per the Code 23 CC for the debt number that 2 relates to the internal stuff in I.C. 3 System's records, and then the last event 4 was changed from retained collections up to 5 verify CBR, which is credit bureau 6 reporting investigation complete. Am I 7 correct in that, or did I get any of that 8 wrong?</p> <p>9 A. I think you got it right.</p> <p>10 Q. Okay. All right. So reading 11 this, reading this ACDV entry, TransUnion 12 was telling I.C. System that Ms. Dorsey 13 disputed that the account was hers and that 14 she also disputed the balance or past due 15 amount. That's what's communicated by 16 TransUnion; right?</p> <p>17 A. Yes.</p> <p>18 Q. All right. And did I.C. System 19 conduct an investigation of Ms. Dorsey's 20 dispute in May of 2022?</p> <p>21 A. Yes.</p> <p>22 Q. Did I.C. System have sufficient 23 information to conduct an investigation of</p>

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<p>1 her dispute in May of '22?</p> <p>2 A. Yes.</p> <p>3 Q. As part of the ACDV process,</p> <p>4 TransUnion or any other credit reporting</p> <p>5 agency will send a copy of any letter or</p> <p>6 any documents a consumer submits with his</p> <p>7 or her dispute; is that correct?</p> <p>8 MR. GOLDEN: Form.</p> <p>9 A. I am not familiar with</p> <p>10 TransUnion's policy. I know that in this</p> <p>11 case we did not receive any attachments.</p> <p>12 Q. All right. Hang on one second.</p> <p>13 Bear with me real briefly here. All right.</p> <p>14 I want to show you a document that I</p> <p>15 received from TransUnion. And, first, let</p> <p>16 me ask you this: Have you ever seen this</p> <p>17 before?</p> <p>18 A. I haven't seen this exact</p> <p>19 document.</p> <p>20 Q. Okay. Do you know what this</p> <p>21 document is by any chance?</p> <p>22 A. It looks like information related</p> <p>23 to -- I'm not sure.</p>	<p>1 person responsible for this specific</p> <p>2 investigation. But she was -- and I'm not</p> <p>3 sure. It's come to light that her name</p> <p>4 remained on these reports after she was no</p> <p>5 longer working for I.C. System. But I</p> <p>6 don't dispute that she was involved in our</p> <p>7 ACDV process during the time she worked for</p> <p>8 us.</p> <p>9 Q. Okay. I got you. And if we look</p> <p>10 at this over here, it says it -- it's got</p> <p>11 my client's name, address, social, date of</p> <p>12 birth, phone number, and then it shows the</p> <p>13 dispute, not his/hers, the dispute balance,</p> <p>14 amount past due. And we saw that in the</p> <p>15 notes, did we not?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. That's fine. And the</p> <p>18 reason I'm asking about this and even</p> <p>19 brought this up is, up here, it says image</p> <p>20 yes-1, which based on my own personal</p> <p>21 experience I understand means they have</p> <p>22 scanned in and sent an image with the ACDV.</p> <p>23 Is it I.C. System's testimony that it did</p>
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<p>1 Q. Sure. And let me be clear. I</p> <p>2 don't want you to guess. And the only</p> <p>3 reason I bring this up is, this was</p> <p>4 represented to me to be TransUnion's record</p> <p>5 of the ACDV and response. I'll just tell</p> <p>6 you that. I'm not verifying that. I'm</p> <p>7 just saying that's what was represented to</p> <p>8 me. And as part of this, they claimed, it</p> <p>9 looks like, update authored by Katie</p> <p>10 Willow. Do you know if Ms. Willow is an</p> <p>11 employee of I.C. System?</p> <p>12 A. She is a former employee.</p> <p>13 Q. Okay. At the time she worked at</p> <p>14 I.C. System, would she have been tasked</p> <p>15 with doing or investigating disputes?</p> <p>16 A. Yes.</p> <p>17 Q. All right. So it's not unusual</p> <p>18 or it's not out of the blue that her name</p> <p>19 would appear here as the person that</p> <p>20 TransUnion said authored the dispute</p> <p>21 response; is that fair?</p> <p>22 A. Well, she was the manager of the</p> <p>23 group, so I'm not sure if she was the</p>	<p>1 not receive a copy of Ms. Dorsey's dispute</p> <p>2 letter?</p> <p>3 A. Yes.</p> <p>4 Q. Okay.</p> <p>5 A. I should correct that to say, I</p> <p>6 don't believe we received it in conjunction</p> <p>7 with the ACDV. I believe it's in our file</p> <p>8 now.</p> <p>9 Q. Okay. Just so I'm clear because</p> <p>10 this is important to me, prior to the</p> <p>11 lawsuit at issue in this case being filed,</p> <p>12 did I.C. System get a copy of Ms. Dorsey's</p> <p>13 dispute letter?</p> <p>14 MR. GOLDEN: Form.</p> <p>15 A. I would have to look at the</p> <p>16 account history to see when or if that was</p> <p>17 received.</p> <p>18 Q. Okay. Can we do that? Because</p> <p>19 this is an important point going forward in</p> <p>20 this deposition.</p> <p>21 A. Yes.</p> <p>22 Q. I can pull this up. Though, I'll</p> <p>23 tell you, I don't know if that's in the</p>

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<p>1 redactions or not. I don't have an 2 unredacted copy. If you want to take a 3 minute or two and look and come back, 4 that's perfectly okay.</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Let's just take a moment 7 and then -- that's fine.</p> <p>8</p> <p>9 (Break taken.)</p> <p>10</p> <p>11 Q. Ms. Dorsey, have you had a chance 12 to look at the helpful documents?</p> <p>13 A. Yes.</p> <p>14 Q. When did I.C. System first 15 receive my client's dispute letter she 16 wrote to TransUnion regarding this account?</p> <p>17 A. After litigation had started.</p> <p>18 Q. Does I.C. System maintain copies 19 of the ACDVs or ACDV responses for 20 disputes?</p> <p>21 A. If there are attachments, those 22 are saved in our system. Oftentimes, there 23 aren't attachments and then we don't --</p>	<p>1 Q. Okay. You told me e-OSCAR Code 2 001 means not mine. And I think you told 3 me that to investigate that, I.C. System 4 verified the name, address, and social 5 security number it had in its files with 6 what was on the ACDV. Did I hear you 7 correctly?</p> <p>8 A. I believe that's part of the 9 process. We look at different data points, 10 but those are some of the data points that 11 we use.</p> <p>12 Q. Are you aware of anything beyond 13 name, address, social security number, that 14 was looked at or reviewed in investigating 15 my client's dispute in May of '22?</p> <p>16 A. I'm not sure. I think because 17 the name and the social security number and 18 the address all matched, we were -- our 19 investigation process was confident that we 20 had the right person.</p> <p>21 Q. Okay. And then also, as we 22 pointed out, there was a dispute regarding 23 balance and/or amount past due. Do you</p>
<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>
<p>there's not really anything to save. We receive the disputes in e-OSCAR, and then we respond back in e-OSCAR.</p> <p>Q. Does I.C. System, in e-OSCAR, have access to this particular dispute in May of 22nd?</p> <p>A. The disputes are only available for 90 days after the dispute is responded to. And so in this instance, the dispute would have been deleted before the litigation was received.</p> <p>Q. Okay. All right. So that we're -- and I won't beat the dead horse. But so I'm absolutely clear, I.C. System's testimony is that it did not receive a copy of the May 22nd dispute letter from my client until after litigation was commenced; fair?</p> <p>A. Yes.</p> <p>Q. And so TransUnion never provided a copy of that letter to I.C. System; is that correct?</p> <p>A. I believe so.</p>	<p>recall that?</p> <p>A. Yes.</p> <p>Q. All right. What would've been reviewed or what was reviewed to investigate that dispute?</p> <p>A. We would have reviewed the amount the creditor claimed was validly due and owing. And if it matched the amount we were reporting to the bureaus, we would have verified that as accurate.</p> <p>Q. Okay. Hang on one second. Okay. Let me show you what I will mark as Exhibit 5.</p> <p>(Plaintiff's Exhibit 5 was marked for identification.)</p> <p>Q. Exhibit 5, this is the dispute letter that I was referring to. Have you seen this before?</p> <p>A. Yes.</p> <p>Q. Okay. And this was not received by I.C. System until after litigation;</p>
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<p>1 right?</p> <p>2 A. Correct.</p> <p>3 Q. Did you read this, by any chance,</p> <p>4 in preparation for today?</p> <p>5 A. I did not.</p> <p>6 Q. Okay. That's fine. In looking</p> <p>7 at it -- and take your time, if you would</p> <p>8 like to take a look at it closer. It's not</p> <p>9 too terribly long. Would you agree that</p> <p>10 Ms. Dorsey here is again disputing that she</p> <p>11 ever had the service or that it was</p> <p>12 available at her home?</p> <p>13 A. Yes.</p> <p>14 MR. GOLDEN: Form.</p> <p>15 Q. Okay. And then nowhere in</p> <p>16 here -- or let me ask you this: Does it</p> <p>17 appear from this letter, that was the</p> <p>18 dispute letter involved here, that Ms.</p> <p>19 Dorsey is saying that the account does not</p> <p>20 belong to her?</p> <p>21 MR. GOLDEN: Form.</p> <p>22 A. I'm sorry. Can you say that</p> <p>23 again?</p>	<p>1 Sometimes a consumer will electronically</p> <p>2 complete the ACDV and attach a file.</p> <p>3 Perhaps, in this case, she sent the letter</p> <p>4 to TransUnion and they selected the codes.</p> <p>5 I'm not exactly sure how that worked here.</p> <p>6 Q. The evidence so far is that Ms.</p> <p>7 Dorsey sent the letter and then that</p> <p>8 triggered --</p> <p>9 A. Well, I don't know that that's</p> <p>10 true or not. We never got a copy of the</p> <p>11 letter, so I saw this in litigation. I'm</p> <p>12 not sure if any of that -- I don't know</p> <p>13 anything about that.</p> <p>14 Q. Okay. Yeah, and I understand</p> <p>15 that. Let me ask you this: Per I.C.</p> <p>16 System's policies, okay, had ICS received</p> <p>17 this letter along with the ACDV from</p> <p>18 TransUnion, would it have done anything</p> <p>19 differently in the investigation that it</p> <p>20 conducted of the dispute?</p> <p>21 MR. GOLDEN: Form.</p> <p>22 A. Yes.</p> <p>23 Q. What would it have done</p>
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<p>1 Q. Sure. Dispute Code 001, not</p> <p>2 mine, was one of the dispute codes sent;</p> <p>3 right?</p> <p>4 A. Correct.</p> <p>5 Q. Looking at this, and it's only</p> <p>6 really the one page, does it appear that</p> <p>7 she's saying that the account is not hers?</p> <p>8 MR. GOLDEN: Form.</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Where is it saying the</p> <p>11 account is not mine or along those lines?</p> <p>12 A. Well, I think the entire tone is</p> <p>13 she's saying -- not mine is what she</p> <p>14 indicated when she filed the ACDV, and I</p> <p>15 think the tone of this is saying it's not</p> <p>16 mine.</p> <p>17 Q. Well, hang on. She doesn't file</p> <p>18 an ACDV, TransUnion does; is that right?</p> <p>19 A. No.</p> <p>20 Q. Are you saying that Ms. Sharon</p> <p>21 Dorsey filed an ACDV?</p> <p>22 A. Actually, I'm sorry. I should</p> <p>23 correct that. I don't know how this works.</p>	<p>1 differently had it gotten this letter?</p> <p>2 MR. GOLDEN: Form.</p> <p>3 A. The letter would've been directed</p> <p>4 to an individual on our investigation team</p> <p>5 to review the letter and conduct further</p> <p>6 investigation. That's what would've been</p> <p>7 different in terms of I.C. System's</p> <p>8 handling. I don't know that, based on the</p> <p>9 information in the letter, the outcome of</p> <p>10 the investigation would have been</p> <p>11 different. But I know that we didn't get</p> <p>12 the letter because I can see in the notes</p> <p>13 it wasn't referred to one of the members of</p> <p>14 our ACDV team for an additional</p> <p>15 investigation. But, again, I'm not sure</p> <p>16 that the outcome would have been different</p> <p>17 had we received it.</p> <p>18 Q. Okay. And that's because y'all</p> <p>19 didn't receive it, so we can't really -- we</p> <p>20 don't have a crystal ball; right?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. Let me ask you this: Per</p> <p>23 I.C. System's policies, if you know, based</p>

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<p style="text-align: right;">Page 101</p> <p>1 on the content of this letter, would this 2 have triggered one of the ACDV team members 3 to contact AT&T and ask if the service was 4 available or not?</p> <p>5 MR. GOLDEN: Form.</p> <p>6 A. I'm not sure if based on this 7 information they would have requested more 8 verification. You know, the address here 9 matches. The P.O. Box matches, the debt 10 number, the social security number. Again, 11 I believe this would have been communicated 12 to AT&T. I'm not sure what the next steps 13 would be. It's not what happened here, so.</p> <p>14 Q. Yeah. Well, let me ask you this: 15 Per I.C. System policy, let's just focus on 16 dispute Code 001, not mine, for the moment. 17 Okay. TransUnion's ACDV says that's the 18 dispute code or one of them it assigns to 19 it. I.C. System has this letter where it 20 matches the name, the address, birth date, 21 last four of her social security number. 22 Would I.C. System have -- would have -- 23 golly -- I'm tripping over my words.</p>	<p style="text-align: right;">Page 103</p> <p>1 matches, you are the person who originally 2 purchased these services.</p> <p>3 Q. Okay. If what she says in this 4 letter is true, AT&T U-verse is not 5 available at my home address, to this day 6 it's not available, I have not had that 7 service at my current home, I don't owe 8 this money because I've never had the 9 service and it was never available to me, 10 if that's accurate, does she still owe this 11 debt or does I.C. System know?</p> <p>12 MR. GOLDEN: Form.</p> <p>13 A. Based on the information we have, 14 she does owe the debt. AT&T continued to 15 stand by it. We provided them the dispute 16 information. They didn't recall the debt. 17 They didn't tell us that the debt wasn't 18 hers. So we're providing the information 19 to the creditor. They continue to maintain 20 the debt is validly due and owing.</p> <p>21 Q. Okay. I think we saw I.C. System 22 verified the information that was reported 23 to TransUnion about this account was</p>
<p style="text-align: right;">Page 102</p> <p>1 Forgive me. Would I.C. System have done 2 anything different with regard to dispute 3 Code 001 if it had this letter?</p> <p>4 MR. GOLDEN: Form.</p> <p>5 A. I'm not sure. I don't believe 6 so. Typically, when a consumer is claiming 7 fraud or identity theft or some sort of 8 wrongdoing, they would select a fraud code, 9 or there's different ACDV codes that 10 indicate stolen identity or someone opened 11 the account in my name. In that case, 12 there's a different fraud investigation. 13 Here, this seems to be a contract dispute 14 where a consumer is saying, I don't owe the 15 debt. AT&T, I believe, still maintains 16 that she owes the debt. I'm not aware -- I 17 haven't reviewed the contract between AT&T 18 and this consumer, but my understanding is 19 she bought services and AT&T is claiming 20 she owes the debt. So based on the 21 information here, her claiming this is not 22 my debt, AT&T is saying, well, no, the name 23 matches, the address matches, the social</p>	<p style="text-align: right;">Page 104</p> <p>1 correct; right?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. What I have is that the 4 response was sent on May 23rd, 2022. Does 5 that comport with those notes, or do you 6 have any reason to dispute that?</p> <p>7 A. I would have to look at the notes 8 again. Sorry.</p> <p>9 Q. No. You're perfectly fine. This 10 is your examination. The 5/23/22 where it 11 says investigation complete, would that 12 have been the time that the response was 13 sent?</p> <p>14 A. Back to TransUnion, yes.</p> <p>15 Q. Yes. Okay.</p> <p>16 MR. SEALS: John, will you mute? 17 Thank you.</p> <p>18 Q. All right. So part of my 19 question though is confusing, and maybe you 20 can shed some light on this. Reading the 21 interrogatories, it said that the account 22 was closed in February of '22. If the 23 consumer disputes an item of information on</p>

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<p>1 a closed account, what does the -- what are 2 the policies and procedures in that 3 instance?</p> <p>4 A. Well, I kind of tried to explain 5 this. February 20th, 2022, is when it went 6 to retained collections. So the active 7 collections really is closing, but we still 8 retain the account. And so if a dispute is 9 received during that time, it's treated the 10 same as if it had been received during 11 active collections.</p> <p>12 Q. Okay. And that was kind of my 13 question. And based on the notes -- and I 14 will scroll up some for you. Well, never 15 mind. Based on that other exhibit that 16 showed the -- right here on October the 17 30th, 2022, I.C. System requested that the 18 credit bureaus, including TransUnion, 19 delete the tradeline that was being 20 reported; is that right?</p> <p>21 A. Yes.</p> <p>22 Q. What was the reason for 23 requesting this I.C. System tradeline be</p>	<p>1 admissions are?</p> <p>2 A. Yes.</p> <p>3 Q. We'll look at number five here. 4 And I asked I.C. System to admit or deny 5 that I.C. System did not rely on any source 6 of information other than I.C. System's own 7 internal records in the reinvestigation of 8 plaintiff's May 11, 2022, dispute. I.C. 9 System's counsel and I had to meet and 10 confer regardless, and that's kind of what 11 this says over here. It's denied. Do you 12 see that?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. What information, other 15 than I.C. System's own internal records, 16 did I.C. System rely on in investigating my 17 client's May 2022 dispute?</p> <p>18 A. I.C. System's collection software 19 is called ICE. And ICE and AT&T's 20 collection software, which is called Karma, 21 they're hooked up, I guess, or they access 22 each other. Sorry. I'm not IT, but they 23 communicate or they pass information. And</p>
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<p>1 deleted?</p> <p>2 A. Because there was active 3 litigation involving the account.</p> <p>4 Q. Is that I.C. System's policy, 5 that if there's active litigation, to 6 delete or ask that the account be deleted?</p> <p>7 A. Yes.</p> <p>8 Q. So I'm clear, nothing in the 9 account records, notes, because I know 10 there's all those redactions or whatever, 11 nothing changed to cause it to be deleted 12 other than the lawsuit got filed; is that 13 accurate?</p> <p>14 A. Right. Correct.</p> <p>15 Q. All right. Let me show you what 16 I will mark as Exhibit 6.</p> <p>17 (Plaintiff's Exhibit 6 was 18 marked for identification.)</p> <p>19 Q. These are requests for 20 admissions. As an attorney, are you 21 generally familiar with what requests for</p>	<p>1 so in order to do the investigation, we 2 would be relying on the information in ICE 3 and on the information that's in AT&T's 4 collection software called Karma.</p> <p>5 Q. Okay. All right. In reading 6 this four, it appeared that all I.C. System 7 did to investigate this May of 2022 8 dispute, and we can go back and look if we 9 need to, was to verify that the information 10 in its system matched the information on 11 the ACDV; is that right?</p> <p>12 A. I'm sorry. Could you say that 13 again?</p> <p>14 Q. Sure. To investigate, it's my 15 understanding what happened or what 16 transpired was the person conducting the 17 investigation on behalf of I.C. System 18 matched the information in the ACDV with 19 what was contained in I.C. System's 20 records?</p> <p>21 A. Correct.</p> <p>22 Q. When we say I.C. System's 23 records, are we including AT&T's Karma</p>

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<p style="text-align: right;">Page 109</p> <p>1 system as well in that?</p> <p>2 A. Well, I think so because you can</p> <p>3 see in the account notes when it says live</p> <p>4 line or when there's certain information</p> <p>5 provided by the creditor, those are updates</p> <p>6 that we're getting from the creditor in</p> <p>7 realtime that are uploaded into our</p> <p>8 collection system.</p> <p>9 Q. Okay. Other than Karma and ICE,</p> <p>10 if I'm using those correctly, did I.C.</p> <p>11 System rely on any other source of</p> <p>12 information when it verified or, excuse me,</p> <p>13 when it investigated and verified the</p> <p>14 disputed information in May of '22?</p> <p>15 A. No.</p> <p>16 Q. Okay. Let me show you this.</p> <p>17 Just I have a quick question about this.</p> <p>18 Hang on. So some time ago, we sent a</p> <p>19 subpoena to AT&T asking for certain</p> <p>20 information, specifically any documents</p> <p>21 related to Ms. Dorsey's account and any</p> <p>22 information showing that U-verse was</p> <p>23 available at her home. All right. In</p>	<p style="text-align: right;">Page 111</p> <p>1 correct, that there's no information in</p> <p>2 response to my request at AT&T for</p> <p>3 documents relating to the account?</p> <p>4 MR. GOLDEN: Form.</p> <p>5 A. I'm not really sure why. I don't</p> <p>6 have any knowledge on that.</p> <p>7 Q. Okay. That was just confusing to</p> <p>8 me. I appreciate that. All right. And</p> <p>9 I'm about done. But let me ask you this, I</p> <p>10 have another exhibit I can show if I need</p> <p>11 to. Am I correct, based on your prior</p> <p>12 testimony, that I.C. System doesn't know if</p> <p>13 U-verse service was available at my</p> <p>14 client's home at any point?</p> <p>15 A. I have no idea. I would assume</p> <p>16 it is because they signed a contract, but I</p> <p>17 don't know.</p> <p>18 Q. Have you seen a contract that was</p> <p>19 signed because I have not?</p> <p>20 A. I believe that we received terms</p> <p>21 of service. I don't know if it was signed.</p> <p>22 Q. Okay. And then so I'm clear,</p> <p>23 I.C. System did not undertake any</p>
<p style="text-align: right;">Page 110</p> <p>1 response, I've got what I'm showing you</p> <p>2 here as Exhibit 7.</p> <p>3</p> <p>4 (Plaintiff's Exhibit 7 was</p> <p>5 marked for identification.)</p> <p>6</p> <p>7 Q. It just says, we -- I will</p> <p>8 highlight it for you -- other than this</p> <p>9 legal language, I'm unable to find any</p> <p>10 information responsive to your request. Do</p> <p>11 you see that?</p> <p>12 A. Yes.</p> <p>13 Q. I'm curious because it may be an</p> <p>14 issue I need to take up with AT&T. Does</p> <p>15 I.C. System have any documentation from</p> <p>16 AT&T or any records from AT&T that show any</p> <p>17 communications between AT&T and Ms. Dorsey?</p> <p>18 MR. GOLDEN: Form.</p> <p>19 A. I believe that we did request</p> <p>20 validation, and we did get some information</p> <p>21 from the creditor concerning this account.</p> <p>22 Q. Okay. And so is this -- as far</p> <p>23 as you know, does this appear to be</p>	<p style="text-align: right;">Page 112</p> <p>1 independent investigation to see if U-verse</p> <p>2 service was available at my client's home</p> <p>3 or not, did it?</p> <p>4 A. Well, the way it works, we're not</p> <p>5 really investigating that type of</p> <p>6 information. The creditor places an</p> <p>7 account and represents that the debt is</p> <p>8 validly due and owing. And so they have a</p> <p>9 contractual obligation to verify the</p> <p>10 validity of the debt and to keep us</p> <p>11 updated. And as long as they continue to</p> <p>12 do that, we trust that the debts are</p> <p>13 validly due and owing.</p> <p>14 Q. Has I.C. System, if you know,</p> <p>15 asked AT&T for any kind of indemnity or</p> <p>16 anything in this instance based on whatever</p> <p>17 contracts y'all have?</p> <p>18 A. I don't believe so.</p> <p>19 Q. I'll show you finally what will</p> <p>20 be Exhibit 8.</p> <p>21</p> <p>22 (Defendant's Exhibit 8 was</p> <p>23 marked for identification.)</p>

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<p style="text-align: right;">Page 113</p> <p>1 Q. And I'll represent this is 2 something I found. I plugged in my 3 client's address on the AT&T website 4 yesterday asking what services were 5 available. There's her address, 899 6 Honeycutt, and it just says AT&T internet 7 is not available at your address. Does 8 I.C. System have any reason to dispute that 9 this is correct, that this AT&T internet is 10 not available at her home as of at least 11 yesterday?</p> <p>12 MR. GOLDEN: Form.</p> <p>13 A. I don't have information. I'm 14 not sure that that address was provided in 15 connection with this account.</p> <p>16 Q. Do we want to go back and look?</p> <p>17 A. Sure.</p> <p>18 Q. All right. Let's see here. So 19 where we have verified address, that would 20 have been in November?</p> <p>21 A. Yeah. I think the easiest way to 22 do this is to go to the account summary and</p>	<p style="text-align: right;">Page 115</p> <p>1 Q. All right. Here we go. All 2 right. If you'll just give me one moment, 3 I have not seen this before. So let me 4 just look.</p> <p>5 A. Okay.</p> <p>6 Q. And I'm going to mark this as 7 Exhibit 9.</p> <p>8</p> <p>9 (Plaintiff's Exhibit 9 was 10 marked for identification.)</p> <p>11</p> <p>12 Q. And this is a redacted account 13 summary; is that right?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. All right. So if I look 16 down through this, let's see. Just so I'm 17 clear, is there any reason this is blank or 18 is this how it's supposed to look?</p> <p>19 A. Well, it's not supposed to look 20 that way. But this is how every single 21 account summary prints, so.</p> <p>22 Q. Okay. Understood, understood. 23 Okay. Debtor, contact, there's my name,</p>
<p style="text-align: right;">Page 114</p> <p>1 at the bottom -- oh, did you --</p> <p>2 Q. I don't have an account summary.</p> <p>3 THE WITNESS: Dale, I provided 4 you a new redacted account summary. Is 5 there any chance you could email it? I 6 mean, we can go through all of this again.</p> <p>7 MR. SEALS: Yeah. I want to save 8 time. If there's a quick way to do it, I'm 9 all for it.</p> <p>10 MR. GOLDEN: I don't know how 11 long it takes for my email to get to you. 12 Right.</p> <p>13 MR. SEALS: I'm just scrolling 14 through here while we're -- that's my 15 address. That's not here. There's the 16 P.O. Box.</p> <p>17 MR. GOLDEN: All right. Whitney, 18 I just emailed it.</p> <p>19 MR. SEALS: Thank you, Dale. One 20 moment. I'll get it. Are you looking at 21 my email right now? There it is. Got it.</p> <p>22 MR. GOLDEN: Considerably faster 23 than mine.</p>	<p style="text-align: right;">Page 116</p> <p>1 P.O. Box verified. So did I.C. System ever 2 have her home address?</p> <p>3 A. No.</p> <p>4 Q. We can look back at it, but her 5 home address is contained in her letter she 6 sent, I believe.</p> <p>7 A. On the first line.</p> <p>8 Q. Yes, ma'am. Okay. So had I.C. 9 System gotten the letter, they would have 10 had the home address. Would you agree with 11 that?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Assuming that's her home 14 address; right?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. So debtor addresses, 17 social security number, nothing here. And 18 I don't need to know specifics. What is 19 the phase history? Is that just what we 20 talked about, how it went from active, 21 inactive, litigation, that sort of thing?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And then looking at this,</p>

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<p>Page 117</p> <p>1 how many letters were sent to her? 2 A. Two, S means sent and delivered. 3 X means not sent. If it said M, it would 4 say mail returned. So if it says S, we 5 know it was mailed and not returned.</p> <p>6 Q. All right. And then we see the 7 balance here; right?</p> <p>8 A. Correct.</p> <p>9 Q. And then some notes, which look 10 like they match the account notes, 11 basically, with regard to the communication 12 with Ms. Dorsey; is that right?</p> <p>13 A. Yes. It's basically the account 14 history and just kind of scrubbing out all 15 the admin updates and getting to kind of 16 the meat of the notes.</p> <p>17 Q. Okay. And then it looks like 18 phone number history; is that right?</p> <p>19 A. Correct.</p> <p>20 Q. Then debt number, is that AT&T's 21 account number or is that y'all's? Do you 22 know?</p> <p>23 A. Debtor is an internal ICE number.</p>	<p>Page 119</p> <p>1 A. Well, both of these are reports 2 that are pulled out of our collection 3 software.</p> <p>4 Q. Okay. All right. So it might 5 look differently. This is how it looks 6 when it's assembled and printed?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. All right. But no 9 meaningful difference, other than how it 10 looks; is that fair?</p> <p>11 A. Correct. The information is the 12 same. It's just presented differently.</p> <p>13 Q. That's what I'm asking you. All 14 right. Let me ask you this: Had I.C. 15 System determined that U-verse service had 16 never been available at Ms. Dorsey's 17 address, would it have requested that 18 TransUnion delete the account?</p> <p>19 MR. GOLDEN: Form.</p> <p>20 A. If I.C. System determined the 21 debt was not a valid debt, we would have 22 deleted credit reporting.</p> <p>23 Q. I think I'm done, unless</p>
<p>Page 118</p> <p>1 CDN is client debt number. 2 Q. Latest activity, does this mean 3 anything?</p> <p>4 A. It's just like significant. You 5 can see the first credit reported date, 6 last credit reported. It's just kind of 7 significant dates in the collection 8 history.</p> <p>9 Q. Okay. All right. This document 10 I'm looking at, Exhibit 9, would this have 11 been available to whomever wanted to look 12 at it in and about investigating Ms. 13 Dorsey's dispute?</p> <p>14 A. Yeah. I guess you can pull this 15 out of the account notes, but really, 16 typically, someone would just go into ICE 17 and look at this information. It would be 18 presented differently, but all this same 19 information would be in the ICE collection 20 system.</p> <p>21 Q. Is this ICE notes that you're 22 talking about, like Exhibit 2 that we 23 looked at?</p>	<p>Page 120</p> <p>1 Mr. Golden has a bunch of questions.</p> <p>2 MR. SEALS: May I have just a 3 couple of minutes to call my co-counsel and 4 make sure I didn't miss anything because 5 he's smarter than I am?</p> <p>6 MR. GOLDEN: Of course.</p> <p>7 MR. SEALS: One moment. Thank 8 you, guys.</p> <p>9 (Break taken.)</p> <p>10 Q. All right. Ms. Dove, very, very 11 briefly and I think I'm done for now. 12 Based on the account notes we have seen and 13 based on your information at I.C. System, 14 is it true that no one at I.C. System at 15 any time specifically contacted AT&T about 16 this account, other than the automated 17 interactions we have discussed?</p> <p>18 A. That's true.</p> <p>19 Q. Okay. And is it also true that 20 no one at AT&T contacted I.C. System 21 specifically about this account, other than</p>

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<p>1 the automated interactions we discussed 2 today?</p> <p>3 A. That's true. I should say that 4 they have provided debt validation since 5 the lawsuit was filed, but prior to the 6 lawsuit, that's true.</p> <p>7 Q. Thank you for clarifying that. 8 Yeah. That's the timeframe I'm thinking 9 of. Did you understand all my questions 10 today?</p> <p>11 A. Other than when I told you I 12 didn't, yes.</p> <p>13 Q. Excellent. All right. That's 14 all I have for you unless Mr. Golden takes 15 over and asks some.</p> <p>16 MR. GOLDEN: I have no questions. 17 She will read.</p> <p>18 MR. SEALS: No problem. Can we 19 agree 30 days after transcript is delivered 20 for any changes?</p> <p>21 MR. GOLDEN: Yeah. No problem.</p> <p>22 MR. SEALS: Jennifer, I do want a 23 copy, please, electronic, if you don't</p>	<p>1 C E R T I F I C A T E</p> <p>2</p> <p>3 STATE OF ALABAMA) 4 JEFFERSON COUNTY)</p> <p>5 I, Jennifer Lee, Notary Public, 6 do hereby certify that I recorded by means 7 of stenotype the foregoing proceedings at 8 the time and place stated in the caption 9 hereof. And the foregoing represents a 10 full, true, and correct transcript of the 11 proceedings on said occasion.</p> <p>12 I further certify that I am 13 neither of counsel nor of kin to any 14 parties of said cause.</p> <p>15 I further certify that I am duly 16 licensed by the Alabama Board of Court 17 Reporting as a Certified Court Reporter as 18 evidenced by the ACCR number following my 19 name below.</p> <p>20</p> <hr/> <p>21 Jennifer Lee, ACCR #97 22 Expires 9/30/2023</p>
<p>1 mind.</p> <p>2 THE COURT REPORTER: Okay. And 3 how about you, Mr. Golden?</p> <p>4 MR. GOLDEN: Same.</p> <p>5</p> <p>6</p> <p>7 (END OF DEPOSITION.) 8 (11:05 a.m.)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>	<p>1 Page 122</p> <p>2</p> <p>3</p> <p>4 C E R T I F I C A T E</p> <p>5</p> <p>6 STATE OF ALABAMA) 7 JEFFERSON COUNTY)</p> <p>8</p> <p>9 I, MICHELLE DOVE, do hereby 10 certify that the foregoing represents a 11 full, true, and correct transcript of the 12 proceedings at the time and place stated 13 in the caption hereof.</p> <p>14</p> <hr/> <p>15 MICHELLE DOVE</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>

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BIRMINGHAM REPORTING SERVICE
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DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

EXHIBIT 4

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHARON DORSEY,)
)
PLAINTIFF,)
)
v.) **2:22-cv-01489-ACA**
)
TRANS UNION, LLC, and I.C.)
SYSTEM, INC.)
)
DEFENDANTS.)

PLAINTIFF'S EXHIBIT 1
TO DEPOSITION OF
CORPORATE REPRESENTATIVE OF IC SYSTEMS, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHARON DORSEY,)
)
)
PLAINTIFF,)
)
)
v.) **2:22-cv-01489-ACA**
)
)
I.C. SYSTEM, INC.)
)
)
DEFENDANTS.)

**3RD NOTICE TO TAKE DEPOSITION OF
30(b)(6) CORPORATE REPRESENTATIVE OF
DEFENDANT REPRESENTATIVE OF I.C. SYSTEM, INC.**

Take notice, that the Plaintiff will take the deposition of the following entities or individuals pursuant to the Rules of Civil Procedure. The deponent(s) must bring all documents listed in this deposition notice and any attachments, and present the originals of these documents for inspection and copying at the deposition. The deposition will continue until completed.

DEPONENT: **Corporate Representative(s) of IC System, Inc.**

DATE: **Friday, August 18, 2023**

TIME: **9:30 a.m. EST**

PLACE: **Via Zoom**

COURT REPORTER: **Birmingham Reporting**

Please note that pursuant to the Rules of Civil Procedure 30(b)(5) & (6), this corporate Defendant must designate an individual to testify as to the following matters:

1. The Defendant's investigation into the claims made by Plaintiff in the Complaint.
2. The allegations of the Complaint and any amendments thereto.
3. The details and contents of all Defendant's personnel files of any person who was involved in any collection activities, reinvestigation or credit reporting related to Plaintiff's alleged account.
4. All documentation methods, if any, whether computerized, manual, or other, of all activities undertaken by the Defendant or its employees or agents related to the collection of account(s) made the basis of Plaintiff's Complaint.
5. Any correspondence between this Defendant and Plaintiff.
6. The factual basis for the Defendant's Answer (and any amendments).
7. The factual basis for the Defendant's defenses and affirmative defenses contained in the Answer (and any amendments).
8. The maintenance of procedures by Defendant to avoid violations of the Fair Credit Reporting Act.
9. All documents produced to Plaintiff by Defendant in the course of this case.
10. All documents referenced or identified in Defendant's initial disclosures or discovery responses.
11. The history, specific details, and resolution of any formal and informal consumer-initiated complaints, Better Business Bureau Complaints, lawsuits, regulatory actions, claims, litigations, mediations, arbitrations, Commerce department actions, or other actions, legal or otherwise, connected to or arising out of Defendants' consumer debt collection activities, in the period from three (3) years prior to the date of this notice to the present.
12. All communications between you and any other Defendant in this case in any way related to Plaintiff.

13. All discovery responses by Defendant to any discovery requests.
14. Whether or not Defendant's credit reportings to the major credit reporting agencies relating to Plaintiff were accurate.
15. Whether or not Plaintiff owes or ever owed money to AT&T U-Verse or to IC System, Inc.
16. The policies, procedures and practices put in place by the Defendant to insure that the investigations or reinvestigations initiated by Plaintiff (whether directly to Defendant or through a CRA) would result in accurate credit reportings relating to Plaintiff.
17. The definition of "accurate" and "verifiable" as those terms are used in Defendant's investigation or reinvestigation process.
18. The nature and content of any records maintained by the Defendant--including archived copies and recorded conversations--relating to the reinvestigation of any trade lines appearing on Plaintiff's credit report.
19. The existence and content of any reports or documents assessing the accuracy or reliability of credit reporting submitted by Defendant including any reports to or by the credit reporting agencies regarding the accuracy and reliability of those reportings.
20. Amount paid to and training provided to the employees responsible for reinvestigating disputed credit reportings made by the Defendant.
21. The documents and informational resources available to the Defendant's employees who are responsible for reinvestigating disputed credit reportings made by the Defendant.
22. The existence, nature, and content of any training provided to Defendant's employees or agents conducting reinvestigations.
23. The nature, purpose, and means by which requests for reinvestigation are received and by which response may be made.

24. Scope of Defendant's employees' authority to correct credit reporting errors.
25. The existence and content of any policy or procedure for handling credit reporting reinvestigations.
26. The documents which are regularly maintained by the Defendant relative to any investigation or reinvestigation or credit reporting, and the content of those documents relative to the Plaintiff.
27. The identity of any known witnesses to the allegations of fact stated in the complaint or the affirmative defenses asserted by the Defendant.
28. The identity and credentials of any of the Defendant's employees or witnesses who were involved with or handled Plaintiff's account and/or any investigation or reinvestigation relative to Plaintiff's accounts.
29. Any communications between the Defendant and the Plaintiff or any other entity or person relating to the investigation or reinvestigation of any credit reporting relating to the Plaintiff.
30. Any releases or waivers signed by the Plaintiff.
31. The manner in which the Defendant reports or otherwise furnishes credit information to credit reporting agencies.
32. The procedures in place at the Defendant to insure that false or inaccurate information is not reported on any consumer's credit report or to any credit reporting agency.
33. The content of each available data field or segment reported relating to any of Plaintiff's personal identifiers including but not limited to name, address and social security number.
34. The capability of the Defendant's computer to reproduce records of past credit reportings to consumer reporting agencies.

35. The policy, practice, and procedure relating to incomplete reporting of the available data fields or segments reported to credit reporting agencies.
36. Whether Plaintiff disputed any credit information, supplied by the Defendant, which reportings related to any of Plaintiff's personal identifiers including but not limited to name, address and social security number and the contents of said dispute.
37. Whether or not the Defendant received notice from any consumer reporting agency that Plaintiff disputed any credit information, supplied by the Defendant, which reportings related to any of Plaintiff's personal identifiers including but not limited to name, address and social security number and the contents of said dispute.
38. The time and form in which any dispute for the Plaintiff either directly or through a credit bureau was received, and the identity of any persons reviewing or acting on it.
39. The time, place, and any actions taken in response to any notice or dispute from the Plaintiff either directly or through a credit bureau.
40. The steps and measures that were taken in the course of investigating or reinvestigating any credit information supplied by the Defendant, which credit information related to any of Plaintiff's personal identifiers including but not limited to name, address and social security number.
41. The content of any information which was used in order to investigate or reinvestigate any credit reporting dispute by Plaintiff of credit information supplied by the Defendant.
42. The existence and nature of the legal relationship between the Defendant and any consumer reporting agencies to which it reports credit information.
43. Any conditions under which the Defendant has agreed to make its data available to the any consumer reporting agency to which it reports credit information.

44. The policy and procedure for when a consumer, such as Plaintiff, disputes that a trade line reported by this Defendant to any of the credit reporting bureaus is the consumer's account.
45. The policy and procedure upon receipt of documents that support a consumer's dispute such as those provided by Plaintiff to the credit bureaus with Plaintiff's dispute letter in this case.
46. Any document or other evidence in the Defendant's possession or known to the Defendant that establishes that Plaintiff is indebted to this Defendant in any way or is in any way responsible for the debt involved in this lawsuit.
47. Policies and procedures that safeguard against collection efforts being directed at consumers who do not owe the debts this Defendant is attempting to collect.
48. The policies and procedures in use by this Defendant to avoid violations of FDCPA and FCRA.
49. The content of the phone calls of March 3, 2021 and November 1, 2021.

DUCES TECUM

PLEASE TAKE FURTHER NOTICE the designated representative(s) of Defendant must bring the following documents with them to the deposition: All documents responsive to the Request for Production of Documents and documents related to the topics referenced above.

/s/ W. Whitney Seals
W. WHITNEY SEALS,
Attorney for Plaintiff

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certify on July 14, 2023. the foregoing served via e-mail to the following:

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Counsel for IC System Inc.

/s/ W. Whitney Seals
OF COUNSEL

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHARON DORSEY,)
)
PLAINTIFF,)
)
v.) **2:22-cv-01489-ACA**
)
TRANS UNION, LLC, and I.C.)
SYSTEM, INC.)
)
DEFENDANTS.)

PLAINTIFF'S EXHIBIT 2
TO DEPOSITION OF
CORPORATE REPRESENTATIVE OF IC SYSTEMS, INC.

Account History

ICS004

**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT
EXHIBIT 4-B**

2/20/2022 5:55:52 PM	Updated	Last event changed from Dispute - Answer Not Required to New Business	IC House Collector	235880288-1
2/20/2022 5:55:52 PM	Updated	Working team changed from ATT WH Universe CW Phase to AT&T Warehouse House	IC House Collector	235880288-1
2/20/2022 5:55:52 PM	Updated	Current linked debt phase state ID changed from 675082768 to 675082774	IC House Collector	235880288-1
2/20/2022 5:55:52 PM	Updated	Working team changed from ATT WH Universe Second Phase to ATT WH Universe CW Phase Current linked debt phase state ID changed from 589431988 to 675082768	IC House Collector	235880288-1
2/20/2022 5:55:52 PM	Updated	Assigned collector changed from Lori Bagnewski to IC House Collector Collector assigned effective date changed from Nov 1 2021 1:44PM to nothing Collector assigned expiration date changed from Nov 15 2021 12:00AM to nothing	IC House Collector	235880288-1
2/20/2022 5:55:52 PM	Updated	Working team changed from ATT WH Universe Second Phase to ATT WH Universe CW Phase Assigned collector changed from Lori Bagnewski to IC House Collector Collector assigned effective date changed from Nov 1 2021 1:44PM to nothing Collector assigned expiration date changed from Nov 15 2021 12:00AM to nothing	IC House Collector	235880288-1
2/20/2022 5:55:51 PM	Updated	Current linked debt phase state ID changed from 589431988 to 675082768	Lori Bagnewski	235880288-1
1/1/2021 1:44:03 PM	Verified		Lori Bagnewski	235880288-1
1/1/2021 1:44:03 PM	Updated	Assigned collector changed from Barbara Hause to Lori Bagnewski Collector assigned effective date changed from Mar 3 2021 2:00PM to Nov 1 2021 1:44PM Collector assigned expiration date changed from Mar 17 2021 12:00AM to Nov 15 2021 12:00AM Last event changed from Verify / CBR Investigation complete to Dispute - Answer Not Required	Barbara Hause	235880288-1

ICS005

11/1/2021 1:44:03 PM		Account Note	██████████ mm ms sz was never installed in home, oct 2018 client sz was to remove bill, client services are not available in her area, offered 40% off 10 ms sz not paying yet addy ph & mail	Lori Baggettewitz	Barbara Hause	235600268-1
11/1/2021 1:44:02 PM	Dispute - Answer Not Required	Telephoned - Consumer	OTH - Dispute-Other Debt Numbers: 121920337	Lori Baggettewitz	Barbara Hause	235600268-1 121920337
11/1/2021 1:44:02 PM	Dispute-Other	Telephoned - Consumer	Dispute-Other (Phone, Consumer Mobile (205) 601█████) Debt Number: 121920337	Lori Baggettewitz	Barbara Hause	235600268-1 121920337
11/1/2021 1:37:08 PM	Agent Release	Telephoned - Consumer	(205) 601█████ Agent: 50055 Call Time: 3656 Debt Numbers: 121920337		Barbara Hause	235600268-1 121920337
11/1/2021 1:23:28 PM	Answer Machine	Telephoned - Consumer	(305) 815█████ Agent: Dated Call Time: 9s Debt Numbers: 121920337		Barbara Hause	235600268-1 121920337
10/29/2021 8:48:08 AM	Consumer Hangs Up	Telephoned - Consumer	(205) 601█████ Agent: Dated Call Time: 1s Debt Numbers: 121920337		Barbara Hause	235600268-1 121920337
10/26/2021 8:23:37 AM	Answer Machine	Telephoned - Consumer	(305) 815█████ Agent: Dated Call Time: 4s Debt Numbers: 121920337		Barbara Hause	235600268-1 121920337
10/26/2021 10:19:09 AM	Possible Disconnected Number	Telephoned - Consumer	(205) 601█████ Debt Numbers: 121920337		Barbara Hause	235600268-1 121920337
10/26/2021 9:49:18 AM	Answer Machine	Telephoned - Consumer	(205) 601█████ Agent: Dated Call Time: 4s Debt Numbers: 121920337		Barbara Hause	235600268-1 121920337
10/26/2021 9:42:27 AM	Answer Machine	Telephoned - Consumer	(305) 815█████ Agent: Dated Call Time: 4s Debt Numbers: 121920337		Barbara Hause	235600268-1 121920337
10/21/2021 2:18:45 PM	Consumer Hangs Up	Telephoned - Consumer	(205) 601█████ Agent: Dated Call Time: 11s Debt Numbers: 121920337		Barbara Hause	235600268-1 121920337
10/21/2021 2:02:14 PM	Answer Machine	Telephoned - Consumer	(305) 815█████ Agent: Dated Call Time: 4s Debt Numbers: 121920337		Barbara Hause	235600268-1 121920337
10/6/2021 8:39:24 AM	Verify / CBR Investigation complete	ACDV	ACDV-TDN: 610-Claims paid, 111-Company will delete / Verify response: 23 cc Debt Numbers: 121920337		Barbara Hause	235600268-1 121920337
10/6/2021 8:38:23 AM		Updated	Last event changed from Dispute - Answer Not Required to Verify / CBR Investigation complete		Barbara Hause	235600268-1
5/6/2021 8:39:12 PM		Updated	LetterStatusCode changed from P to X	batchuser	Barbara Hause	235600268-1
5/6/2021 9:39:12 PM		Account Note	User Requested	batchuser	Barbara Hause	235600268-1
5/6/2021 9:01:22 PM		Added	Letter Request: 540 - 4th letter in the Initiative		Barbara Hause	235600268-1
3/17/2021 10:51:31 PM		Account Note	██████████ User Requested	batchuser	Barbara Hause	235600268-1
3/17/2021 10:25:39 PM		Added	Letter Request: 278 - Settlement		Barbara Hause	235600268-1
3/3/2021 10:22:00 PM		Updated	Consumer Sharon Dorsey Home Phone (Verified) (205) 601█████ type changed from Home to Mobile	batchuser	Barbara Hause	235600268-1
3/3/2021 2:00:56 PM		Viewed			Barbara Hause	235600268-1

ICS006

3/3/2021 2:08:55 PM		Updated	Assigned collector changed from IC House Collector to Barbara Haulto Collector assigned effective date changed from nothing to Mar 3 2021 2:08PM Collector assigned expiration date changed from nothing to Mar 17 2021 12:00AM Last event changed from New Business to Dispute - Answer Not Required Disputed flag changed from No to Yes	IC House Collector	235680288-1	
3/3/2021 2:08:55 PM		Updated	Assigned collector changed from IC House Collector to Barbara Haulto Collector assigned effective date changed from nothing to Mar 3 2021 2:08PM Collector assigned expiration date changed from nothing to Mar 17 2021 12:00AM Last event changed from New Business to Dispute - Answer Not Required	IC House Collector	235680288-1	
3/3/2021 2:08:54 PM	Dispute - Answer Not Required	Consumer Called	OTH - Dispute-Other Debt Numbers: 121920337	Barbara Haulto	IC House Collector	235680288-1 121920337
3/3/2021 2:08:54 PM	Dispute-Other	Consumer Called	Dispute-Other (Phone: Consumer Unidentified Phone) Debt Numbers: 121920337	Barbara Haulto	IC House Collector	235680288-1 121920337
3/3/2021 2:08:54 PM		Updated	Consumer Sharon Dorsey Bill To Addressee reason changed from Melissa Updated to nothing status changed from Unknown to Verified	Barbara Haulto	IC House Collector	235680288-1
3/3/2021 2:08:54 PM		Updated	Disputed flag changed from No to Yes	Barbara Haulto	IC House Collector	235680288-1
3/3/2021 2:08:54 PM		Added	Consumer Sharon Dorsey Home Phone [Verified] (205) 601 [REDACTED]	Barbara Haulto	IC House Collector	235680288-1
3/3/2021 2:08:54 PM		Account Note	205601 [REDACTED] vic min ins disp all could not provide service at that time never had service not used in area at that time ver eddy and email #	Barbara Haulto	IC House Collector	235680288-1
2/23/2021 8:17:28 AM	Line Busy	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Debt Numbers 121920337		IC House Collector	235680288-1 121920337
2/23/2021 8:08:50 AM	Answer Machine	Telephoned - Consumer	(305) 815 [REDACTED] Agent Dated Call Time: 46 Debt Numbers: 121920337		IC House Collector	235680288-1 121920337
2/20/2021 11:57:31 AM	Line Busy	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Debt Numbers: 121920337		IC House Collector	235680288-1 121920337
2/20/2021 11:55:56 AM	Answer Machine	Telephoned - Consumer	(305) 815 [REDACTED] Agent Dated Call Time: 96 Debt Numbers: 121920337		IC House Collector	235680288-1 121920337
2/19/2021 11:50:59 PM	Vendor Data Apend Request	Batch Processing	Credit Monitor-Expense-CreditBatch-Pacement Debt Numbers: 121920337		IC House Collector	235680288-1 121920337
2/19/2021 11:50:59 PM	Start Phase	Batch Processing	Litigation Debt Numbers: 121920337		IC House Collector	235680288-1 121920337
2/19/2021 11:50:59 PM	Start Phase	Batch Processing	Seconda Debt Numbers: 121920337		IC House Collector	235680288-1 121920337
2/19/2021 11:50:59 PM	Restart Service - Due to Skip	Batch Processing	Skip Trace Debt Numbers: 121920337		IC House Collector	235680288-1 121920337
2/19/2021 11:50:59 PM	Not Allowed - Skip Phase	Batch Processing	3rd Party - Retained Debt Numbers: 121920337		IC House Collector	235680288-1 121920337

ICS007

2/19/2021 11:59:59 PM	Not Allowed - Stop Phase	Batch Processing	Attorney Referral Debt Number: 121920337	IC House Collector	235660288-1	121920337
2/19/2021 11:59:59 PM	Not Allowed - Stop Phase	Batch Processing	Pre-Litigation Debt Numbers: 121920337	IC House Collector	235660288-1	121920337
2/19/2021 11:59:59 PM	New Business	Batch Processing	Litigation Debt Numbers: 121920337	IC House Collector	235660288-1	121920337
2/19/2021 11:59:59 PM	New Business	Batch Processing	Seconds Debt Numbers: 121920337	IC House Collector	235660288-1	121920337
2/19/2021 11:59:59 PM	Credit Monitoring / Add Monitoring	Batch Processing	Credit Monitor-Experian-Creditch-Placement Debt Numbers: 121920337	IC House Collector	235660288-1	121920337
2/19/2021 9:13:23 PM		Updated	Working item changed from AT&T Warehouse House to ATT WH Universe Seconds Phase	IC House Collector	235660288-1	
2/19/2021 9:13:23 PM		Updated	Collector assigned effective date changed from Feb 19 2021 12:00AM to nothing Current linked debt phase state ID changed from 599431891 to 599431898	IC House Collector	235660288-1	
2/19/2021 9:13:23 PM		Updated	Working item changed from Corporate Litigation to AT&T Warehouse House	IC House Collector	235660288-1	
2/19/2021 9:13:23 PM		Updated	Current linked debt phase state ID changed from 599431893 to 599431891	IC House Collector	235660288-1	
2/19/2021 9:13:23 PM		Updated	Collector assigned effective date changed from nothing to Feb 19 2021 12:00AM	IC House Collector	235660288-1	
2/19/2021 9:13:23 PM		Updated	Collector assigned effective date changed from nothing to Feb 19 2021 12:00AM	IC House Collector	235660288-1	
2/19/2021 9:13:22 PM		Updated	Working item changed from Corporate Pre Litigation to Corporate Litigation	IC House Collector	235660288-1	
2/19/2021 9:13:22 PM		Updated	Assigned collector changed from Eric Anderson to IC House Collector Collector assigned effective date changed from Feb 20 2021 3:13AM to nothing Current linked debt phase state ID changed from 599431841 to 599431853	Eric Anderson	235660288-1	
2/19/2021 9:13:22 PM		Updated	Working item changed from Corporate Attorney Referral to Corporate Pre Litigation	IC House Collector	235660288-1	
2/19/2021 9:13:22 PM		Updated	Assigned collector changed from IC House Collector to Eric Anderson Collector assigned effective date changed from nothing to Feb 20 2021 3:13AM	IC House Collector	235660288-1	
2/19/2021 9:13:22 PM		Updated	Current linked debt phase state ID changed from 599431826 to 599431841	IC House Collector	235660288-1	

ICS008

2/19/2021 8:13:22 PM		Updated	Working Team changed from ATT WHI Universe Intensive Press to Corporate Attorney (Retired)	IC House Collector	235660268-1
2/19/2021 8:13:22 PM		Updated	Current linked debt phone state ID changed from 589470315 to 589431826	IC House Collector	235660268-1
2/11/2021 2:12:23 PM	Answer Machine	Telephoned - Consumer	(205) 68 [REDACTED] Agent Dialed Call Time: 8s Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
2/11/2021 2:02:52 PM	Answer Machine	Telephoned - Consumer	(305) 81 [REDACTED] Agent Dialed Call Time: 8s Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
2/11/2021 10:03:26 AM	Answer Machine	Telephoned - Consumer	(205) 68 [REDACTED] Agent Dialed Call Time: 4s Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
2/11/2021 8:25:04 AM	Answer Machine	Telephoned - Consumer	(305) [REDACTED] Agent Dialed Call Time: 8s Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
2/10/2021 10:43:35 PM		Updated	LetterStatusCode changed from P to S ToAddressId changed from nothing to 322295783	batchuser	IC House Collector 235660268-1
2/10/2021 9:12:28 PM		Added	Letter Request: 279 - Settlement	IC House Collector	235660268-1
2/8/2021 2:58:21 PM	Answer Machine	Telephoned - Consumer	(205) 68 [REDACTED] Agent Dialed Call Time: 8s Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
2/8/2021 2:16:28 PM	Answer Machine	Telephoned - Consumer	(305) 81 [REDACTED] Agent Dialed Call Time: 8s Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
2/4/2021 8:40:28 AM		Viewed		Jonathan Polarska	IC House Collector 235660268-1
2/4/2021 8:08:53 AM	Answer Machine	Telephoned - Consumer	(305) 81 [REDACTED] Agent Dialed Call Time: 8s Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
2/1/2021 9:42:08 AM	No Answer	Telephoned - Consumer	(205) 68 [REDACTED] Agent Dialed Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
2/1/2021 9:19:30 AM	Answer Machine	Telephoned - Consumer	(305) 81 [REDACTED] Agent Dialed Call Time: 8s Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
1/28/2021 8:19:12 AM	No Answer	Telephoned - Consumer	(205) 68 [REDACTED] Agent Dialed Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
1/28/2021 8:15:52 AM	Answer Machine	Telephoned - Consumer	(305) 81 [REDACTED] Agent Dialed Call Time: 8s Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
1/27/2021 8:20:31 PM		Updated	ScoreDateTime changed from Jan 24 2021 4:35PM to Jan 27 2021 8:25PM	batchuser	IC House Collector 235660268-1
1/25/2021 8:54:07 AM	No Answer	Telephoned - Consumer	(205) 68 [REDACTED] Agent Dialed Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
1/25/2021 8:49:17 AM	Answer Machine	Telephoned - Consumer	(305) 81 [REDACTED] Agent Dialed Call Time: 8s Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
1/24/2021 4:35:08 PM		Updated	ScoreDateTime changed from Jan 22 2021 7:42PM to Jan 24 2021 4:35PM	batchuser	IC House Collector 235660268-1
1/22/2021 7:42:13 PM		Updated	ScoreDateTime changed from Jan 21 2021 6:20PM to Jan 22 2021 7:42PM	batchuser	IC House Collector 235660268-1
1/21/2021 8:20:30 PM		Updated	ScoreDateTime changed from Jan 19 2021 6:30PM to Jan 21 2021 6:20PM	batchuser	IC House Collector 235660268-1

ICS009

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT
EXHIBIT 4-B

1/21/2021 1:54:13 PM	No Contact	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Call Time: 2s Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337
1/21/2021 1:50:25 PM	Answer Machine	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Call Time: 9s Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337
1/21/2021 8:51:24 AM	No Answer	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337
1/21/2021 8:56:13 AM	Answer Machine	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Call Time: 9s Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337
1/19/2021 6:39:38 PM		Updated	ScoreValue changed from 408 to 409 ScoreDateTime changed from Jan 18 2021 8:19PM to Jan 19 2021 8:30PM	batchuser	IC House Collector	235660268- 1
1/18/2021 6:18:43 PM		Updated	ScoreValue changed from 413 to 409 ScoreDateTime changed from Jan 17 2021 4:54PM to Jan 18 2021 8:18PM	batchuser	IC House Collector	235660268- 1
1/18/2021 11:26:56 AM	Consumer Hangs Up	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Call Time: 1s Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337
1/18/2021 11:20:02 AM	Answer Machine	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Call Time: 4s Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337
1/17/2021 4:54:35 PM		Updated	ScoreValue changed from 423 to 413 ScoreDateTime changed (from Jan 15 2021) 8:13PM to Jan 17 2021 4:54PM	batchuser	IC House Collector	235660268- 1
1/16/2021 8:13:38 PM		Updated	ScoreDateTime changed (from Jan 14 2021) 8:23PM to Jan 15 2021 8:13PM	batchuser	IC House Collector	235660268- 1
1/15/2021 8:21:25 AM	No Answer	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337
1/15/2021 8:07:32 AM	Answer Machine	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Call Time: 9s Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337
1/14/2021 8:23:29 PM		Updated	ScoreValue changed from 431 to 423 ScoreDateTime changed (from Jan 13 2021) 8:22PM to Jan 14 2021 8:23PM	batchuser	IC House Collector	235660268- 1
1/13/2021 8:22:00 PM		Updated	ScoreValue changed from 443 to 431 ScoreDateTime changed (from Jan 12 2021) 8:33PM to Jan 13 2021 8:23PM	batchuser	IC House Collector	235660268- 1
1/12/2021 8:33:39 PM		Updated	ScoreValue changed from 457 to 443 ScoreDateTime changed (from Jan 10 2021) 8:42PM to Jan 12 2021 8:33PM	batchuser	IC House Collector	235660268- 1
1/12/2021 8:54:28 AM	No Answer	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337
1/12/2021 8:52:47 AM	Answer Machine	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Call Time: 9s Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337
1/11/2021 8:19:19 AM	No Answer	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337
1/11/2021 8:14:38 AM	Answer Machine	Telephoned - Consumer	(205) 681 [REDACTED] Agent Dated Call Time: 9s Debt Numbers: 121920337	IC House Collector	235660268- 1	121920337

ICS010

1/10/2021 4:42:47 PM		Updated	ScoreValue changed from 461 to 461 ScoreDateTime changed from Jan 8 2021 6:53PM to Jan 10 2021 4:42PM	batchuser	IC House Collector	235600268-1	
1/8/2021 5:53:08 PM		Updated	ScoreValue changed from 463 to 461 ScoreDateTime changed from Jan 6 2021 8:47PM to Jan 8 2021 6:53PM	batchuser	IC House Collector	235600268-1	
1/8/2021 9:01:32 AM	No Answer	Telephoned - Consumer	(205) 681-XXXX Agent Dated Call Time: 12/19/20337		IC House Collector	235600268-1	121920337
1/8/2021 9:01:37 AM	Answer Machine	Telephoned - Consumer	(305) 815-XXXX Agent Dated Call Time: 8s Debt Numbers: 121920337		IC House Collector	235600268-1	121920337
1/7/2021 9:46:29 AM		Viewed		Cost Chihuahua	IC House Collector	235600268-1	
1/7/2021 9:47:55 AM	No Contact	Telephoned - Consumer	(205) 681-XXXX Agent 50065 Call Time: 8s Debt Numbers: 121920337		IC House Collector	235600268-1	121920337
1/7/2021 9:44:29 AM	Answer Machine	Telephoned - Consumer	(305) 815-XXXX Agent Dated Call Time: 5s Debt Numbers: 121920337		IC House Collector	235600268-1	121920337
1/7/2021 2:28:55 AM		Updated	LetterStatusCode changed from P to S ToAddressId changed from nothing to 322296783	batchuser	IC House Collector	235600268-1	
1/8/2021 9:12:32 PM		Added	Letter Request: 510 - Initial notice - first in the		IC House Collector	235600268-1	
1/8/2021 8:47:22 PM		Updated	ScoreValue changed from 465 to 463 ScoreDateTime changed from Jan 5 2021 7:01PM to Jan 6 2021 8:47PM	batchuser	IC House Collector	235600268-1	
1/8/2021 12:20:18 PM	Answer Machine	Telephoned - Consumer	(205) 681-XXXX Agent Dated Call Time: 4s Debt Numbers: 121920337		IC House Collector	235600268-1	121920337
1/8/2021 10:42:10 AM	Answer Machine	Telephoned - Consumer	(305) 815-XXXX Agent Dated Call Time: 8s Debt Numbers: 121920337		IC House Collector	235600268-1	121920337
1/5/2021 10:38:23 PM		Account Note	Letter #510 Delay or Cancel Requested-MedFlorida Letters	batchuser	IC House Collector	235600268-1	
1/5/2021 10:11:47 PM		Added	Letter Request: 510 - Initial notice - first in the		IC House Collector	235600268-1	
1/5/2021 7:01:50 PM		Updated	ScoreValue changed from 407 to 465 ScoreDateTime changed from Dec 30 2020 6:28PM to Jan 5 2021 7:01PM	batchuser	IC House Collector	235600268-1	
1/5/2021 3:05:38 PM	Possible Disconnected Number	Telephoned - Consumer	(305) 815-XXXX Debt Numbers: 121920337		IC House Collector	235600268-1	121920337
1/4/2021 9:58:23 PM		Account Note	Letter #510 Delay or Cancel Requested-MedFlorida Letters	batchuser	IC House Collector	235600268-1	
1/4/2021 9:42:19 PM		Added	Letter Request: 510 - Initial notice - first in the		IC House Collector	235600268-1	
1/4/2021 8:26:03 PM	Update Consumer Information	Update Information	Collaboration File Sent Update Debt Numbers: 121920337		IC House Collector	235600268-1	121920337
1/4/2021 8:26:03 PM		Debt Note	OCA Name: FC8; Portfolio: UV; Channel: SC;		IC House Collector	235600268-1	
1/4/2021 8:17:38 PM	Update Consumer Information	Update Information	Collaboration File Sent Update Debt Numbers: 121920337		IC House Collector	235600268-1	121920337
1/4/2021 8:17:38 PM		Debt Note	OCA Name: AFN; Portfolio: UV; Channel: TR; Credit Rpt Dir: CRUP;		IC House Collector	235600268-1	

ICS011

1/6/2021 5:59:27 PM	Update Consumer Information	Update Information	Collaboration File Sent Update Debt Numbers 121920337	IC House Collector	235600268-1	121920337
1/6/2021 5:59:27 PM		Debt Note	LIVE LINE UPDATE: Portfolio = UV, Channel = PR	IC House Collector	235600268-1	
1/6/2021 5:59:27 PM		Added	Consumer Sharon Dorsey Unknown Phone [Re AutoDialer] (205) 691 ██████████	batchuser	IC House Collector	235600268-1
12/30/2020 9:39:46 PM		Account Note	Letter #510 Delay or Cancel Requested- Holiday-Delay Letters	batchuser	IC House Collector	235600268-1
12/30/2020 9:39:46 PM		Account Note	Letter #510 Delay or Cancel Requested- Holiday-Delay Letters	batchuser	IC House Collector	235600268-1
12/30/2020 9:39:46 PM		Account Note	Letter #510 Delay or Cancel Requested- MedFincs Letters	batchuser	IC House Collector	235600268-1
12/30/2020 9:39:46 PM		Added	Letter Request: 510 - Initial notice - first in the		IC House Collector	235600268-1
12/30/2020 6:20:40 PM		Updated	ScoreValue changed from 408 to 407 ScoreDateTime changed from Dec 29 2020 6:31PM to Dec 30 2020 6:26PM	batchuser	IC House Collector	235600268-1
12/30/2020 11:55:58 AM	Answer Machine	Telephoned - Consumer	(305) 615-████████ Agent Dated Call Time: 4a Debt Numbers: 121920337		IC House Collector	235600268-1
12/29/2020 6:31:34 PM		Updated	ScoreValue changed from 279 to 405 ScoreDateTime changed from Dec 26 2020 6:30PM to Dec 29 2020 6:31PM	batchuser	IC House Collector	235600268-1
12/29/2020 10:21:52 PM		Updated	Consumer Sharon Dorsey Unknown Phone [Unknown] (305) 615- ████████ type changed from Unknown to Mobile	batchuser	IC House Collector	235600268-1
12/29/2020 4:39:05 PM		Updated	ScoreValue changed from 0 to 279 OriginalScore changed from nothing to 279 OriginalScoreDateTime changed from nothing to Dec 28 2020 6:38PM	batchuser	IC House Collector	235600268-1
12/29/2020 5:54:25 PM		Added	Linked Debt number 128006901 line item 87590857	batchuser	IC House Collector	235600268-1
12/29/2020 4:17:28 PM		Updated	Owner team changed from Communications Letters Only to AT&T Warehouse Working team changed from Communications Notification to ATT WM Uverse Intensive Phase		IC House Collector	235600268-1
12/29/2020 4:17:28 PM		Updated	Collector assigned effective date changed from Dec 26 2020 12:00AM to nothing Current linked debt phase state ID changed from 569870294 to 569870315		IC House Collector	235600268-1
12/29/2020 4:17:28 PM		Added	Debt number 121920337 balance line item 590003788		IC House Collector	235600268-1
12/29/2020 4:17:28 PM		Updated	Collector assigned effective date changed from nothing to Dec 28 2020 12:00AM		IC House Collector	235600268-1

ICS012

12/28/2020 4:17:28 PM		Updated	Working team changed from Communications 3rd-Letters to Communications Notification	IC House Collector	235660268-1
12/28/2020 4:17:28 PM		Updated	Collector assigned effective date changed from Dec 28 2020 12:00AM to nothing Current linked debt phase state ID changed from 589870277 to 589870294	IC House Collector	235660268-1
12/28/2020 4:17:28 PM		Updated	Collector assigned effective date changed from nothing to Dec 28 2020 12:00 AM	IC House Collector	235660268-1
12/28/2020 4:17:28 PM	Vendor Data Append Request	Batch Processing	Standardization-Banko - Lexis Nexus-ATT Bank- Lexis Scrub Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM	Vendor Data Append Request	Batch Processing	Standardization-Banko - Lexis Nexus-DEC Only Includes 7 Yr Monitor Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM	Vendor Data Append Request	Batch Processing	Standardization-NLP- NLP-Scorets-based Business/Int Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM	Start Phase	Batch Processing	Pre-Processing Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM	Start Phase	Batch Processing	Letters Only Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM	Start Phase	Batch Processing	Notification Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM	Start Phase	Batch Processing	Intensive Collection Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM	Restart Service - Due to Skip	Batch Processing	Skip Trace Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM	New Business	Batch Processing	Intensive Collection Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM	New Business	Batch Processing	Notification Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM	New Business	Batch Processing	Letters Only Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM	New Business	Batch Processing	Pre-Processing Debt Numbers: 121920337	IC House Collector	235660268-1 121920337
12/28/2020 4:17:28 PM		Updated	Owner team changed from Corporate Unidentified Debt to Communications Letters Only Working team changed from Unidentified Debt House-Global to Communications 3rd-Letters Collector assigned effective date changed from Dec 28 2020 12:00AM to nothing Current linked debt phase state ID changed from 589870247 to 589870277	IC House Collector	235660268-1
12/28/2020 4:17:28 PM		Updated	Owner team changed from Corporate Unidentified Debt to Communications Letters Only Working team changed from Unidentified Debt House-Global to Communications 3rd-Letters	IC House Collector	235660268-1

ICS013

12/28/2020 4:17:26 PM	Updated	Collector assigned effective date changed from Dec 28 2020 12:00AM to nothing Current linked debt phase state ID changed from 586670247 to 586670277	IC House Collector	235860288-1
12/28/2020 4:17:26 PM	Updated	Collector assigned effective date changed from nothing to Dec 28 2020 12:00AM	IC House Collector	235860288-1
12/28/2020 4:17:26 PM	Updated	Owner team changed from Global Default to Corporate Unidentified Debt Working team changed from nothing to Unidentified Debt House-Global	IC House Collector	235860288-1
12/28/2020 4:17:26 PM	Updated	Assigned collector changed from nothing to IC House Collector	IC House Collector	235860288-1
12/28/2020 4:17:25 PM	Added	Debt number 121920337 balance line item 5560003736		235860288-1
12/28/2020 4:17:25 PM	Updated	Current linked debt phase state ID changed from nothing to 586670247		235860288-1
12/28/2020 4:08:03 PM	Updated	Status changed from Batch Entered to Active	batchuser	235860288-1
12/28/2020 3:10:44 PM	Debt Note	WARN NO - PhoneID 479843730 (0000000000) is being skipped, phone number contains invalid prefix.		235860288-1
12/28/2020 3:10:44 PM	Debt Note	WARN NO - PhoneID 479843732 (1111110002) is being skipped, phone number contains invalid prefix.		235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 147904330	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 balance line item 556672760	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 balance line item 586672761	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440136	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440138	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440137	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440138	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440139	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440140	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440141	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440142	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440112	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440113	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440114	batchuser	235860288-1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440115	batchuser	235860288-1

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12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440116	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440117	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440118	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440119	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440120	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440121	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440122	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440123	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440124	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440125	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440126	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440127	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440128	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440129	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440130	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440131	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440132	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440133	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440134	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Debt number 121920337 line item 1463440135	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Linked Debt number 1	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Consumer Sharon Dorsey Unknown Phone (Unknown)	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] Sharon Dorsey Bill To Address PO Box 228	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Consumer Sharon Dorsey Last Client Address Address PO BOX 228	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Consumer Sharon Dorsey	batchuser	235660268- 1
12/28/2020 3:10:44 PM	Added	Consumer Sharon Dorsey Unknown Email DORVERTB863@GMAIL. COM	batchuser	235660268- 1

ICS015

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT
EXHIBIT 4-B

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHARON DORSEY,)
)
PLAINTIFF,)
)
v.) **2:22-cv-01489-ACA**
)
TRANS UNION, LLC, and I.C.)
SYSTEM, INC.)
)
DEFENDANTS.)

PLAINTIFF'S EXHIBIT 3
TO DEPOSITION OF
CORPORATE REPRESENTATIVE OF IC SYSTEMS, INC.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHARON DORSEY,

Plaintiff,

v.

Case No.: 2:22-cv-01489-GMB

TRANS UNION, LLC and
IC SYSTEM, INC.,

Defendants.

**DEFENDANT'S NOTICE OF SERVING
ANSWERS TO PLAINTIFF'S INTERROGATORIES**

Defendant, I.C. SYSTEM, INC. ("Defendant" and/or "ICS"), by and through its undersigned counsel, serves it Notice of Serving Answers to Plaintiff's Interrogatories.

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April 2023, a true and correct copy of the above and foregoing document has been sent by Electronic Mail to the following parties:

Whitney Seals
filings@cochrunseals.com
Cochrun & Seals, LLC
P.O. Box 10448
Birmingham, AL 35202
Counsel for Plaintiff

John C Hubbard
jch@jchubbardlaw.com
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1130 22nd Street South
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Attorneys for Defendant Trans Union LLC

M Brent Yarborough
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Birmingham, AL 35203
Co-counsel for Defendant I.C. System, Inc.

By:

/s/ Dale T. Golden
Dale T. Golden, Esq.
GOLDEN SCAZ GAGAIN, PLLC
1135 Marbella Plaza Drive
Tampa, Florida 33619
Phone: (813) 251-5500
dgolden@gsgfirm.com
Counsel for Defendant I.C. System, Inc.

Defendant I.C. Systems, Inc.'s Answers to Plaintiff's Interrogatories

INTERROGATORY NO. 1:

Identify the names, addresses, and telephone numbers of all persons who were witness to or who have personal knowledge of any of the facts, events, or matters that are alleged in Plaintiff's complaint, your answer, and/or defenses thereto and describe and explain your understanding of the matters on which the persons named have knowledge. In addition to identifying said individuals as specified in the instructions above, please include the following:

- (a) Please state whether each such person is affiliated with, or related to, or employed by any party (or its agents, servants, officers, or employees) to this lawsuit;
- (b) If any of the persons so listed in response to this interrogatory do not fit the characterization in subpart (a) above, please describe the nature of their involvement in this lawsuit;
- (c) Please explain and describe your understanding of their knowledge of such facts.

RESPONSE: Defendant identifies the following individuals that may have knowledge of facts relevant to the claims and/or defenses in this matter:

Corporate Representative of Defendant I.C. SYSTEM, INC.
Barbara Hauke, employee of Defendant
Lori Bagniewski, employee of Defendant
c/o Dale Thomas Golden, Esq.
(Admitted *pro hac vice*)
Golden Scaz Gagain, PLLC
1135 Marbella Plaza Drive
Tampa, FL 33619
(813) 251-5500
dgolden@gsgfirm.com
Attorneys for I.C. System, Inc.

- **ICS is a Defendant and has general knowledge related to Plaintiff's**

claims identified in the Complaint, knowledge of ICS's collection efforts of the subject ATT U-verse account and knowledge of ICS's general business practices. As reflected in the Account History and Account Summary produced by ICS in Response to Plaintiff's First Requests for Production, the following ICS employees were involved in collection and investigation of Plaintiff's account:

- On or about March 3, 2021, ICS was first contacted by the Plaintiff via an incoming call from 205-601-1146. ICS representative Barbara Hauke then spoke with the individual on the call, who identified herself as Sharon Dorsey. *See, Call Recording dated March 3, 2021 (13 minutes).*
- Based on the substance of the conversation, Barbara Hauke updated the account notes to indicate that the Plaintiff disputed the debt. *See, ICE Summary at 3/3/2021 (2:09:54 PM).*
- On November 1, 2021, ICS representative Lori Bagniewski placed a call to 205-601-1146 and spoke with an individual who identified herself as Sharon Dorsey. *See, Call Recording dated November 1, 2021 (9 minutes, 4 seconds).*

INTERROGATORY NO. 2:

Please state whether you have reported the IC System account relating to the Plaintiff to any entity, including, but not limited to, any credit bureau and, in connection with your response, please identify the recipients of such reports, the manner reported, the identifying data connected with the report, and explain and describe the manner and identifiers under which you received the information.

RESPONSE: Defendant electronically reported the account to TransUnion, Experian, and Innovis using the social security number it received from ATT U-Verse. When the Plaintiff disputed owing the account during the March 3, 2021 telephone call with I.C. System employee Barbara Hauke, Ms. Hauke updated the account to indicate the Plaintiff's dispute. The credit reporting on the account was thereafter automatically updated to include the Plaintiff's dispute.

INTERROGATORY NO. 3:

State all of the facts and describe all actions you took, including, but not limited to, correspondence and communications with any consumer reporting agency, creditor or potential creditor, or the Plaintiff, with regard to or which in any way references the Plaintiff and/or the IC System Account for the two years prior to the lawsuit.

RESPONSE: Defendants only contact with any “creditor or potential creditor” regarding the Plaintiff involved the ATT U-Verse communication of information related to the account on December 12, 2020, and when Defendant closed the account on February 20, 2022.

Defendant reported the account to TransUnion, Experian, and Innovis using the social security number it received from ATT U-Verse. When the Plaintiff disputed owing the account during the March 3, 2021 telephone call with I.C. System employee Barbara Hauke, Ms. Hauke updated the account to indicate the Plaintiff’s dispute. The credit reporting on the account was thereafter automatically updated to indicate the Plaintiff’s dispute.

Defendant thereafter submitted information to TransUnion, Experian, and Innovis indicating the Plaintiff disputed the account. Defendant submitted a request for deletion of the credit reporting on the account on October 29, 2022.

On October 6, 2021, Defendant received an ACDV from TransUnion with an E-Oscar code “111”, which means “claims company will delete.” Ms. Hauke investigated the issue and, based upon the results of that investigation, verified the accuracy of Defendant’s credit reporting.

On May 23, 2022, Defendant received an ACDV from TransUnion with the E-Oscar code “001”, which means “not mine.” An I.C. System employee confirmed that certain personal identifying information included in the ACDV matched the information that ATT U-Verse had provided

Defendant when it referred the account and, because the information matched, verified the accuracy of Defendant's credit reporting.

INTERROGATORY NO. 4:

State whether you have reported data on the Plaintiff's consumer reports which is inaccurate and, if so, state why such inaccurate information was placed on his/her/their consumer report(s), state the date(s) such report(s) was (were) issued, to whom the report(s) was (were) issued, and state what you could and should have done to prevent the inaccurate data from being reported on Plaintiff's consumer report(s) for the four years prior to the lawsuit.

RESPONSE: Defendant does not believe it reported inaccurate information regarding the ATT U-Verse account belonging to the Plaintiff to any person or entity.

INTERROGATORY NO. 5:

State your procedures (and identify all documents related thereto) designed to ensure the proper investigation or reinvestigation of disputed consumer data and the overall accuracy of the information in your consumer credit database and consumer reports you issued that was in use and in effect at the time of the incidents made the basis of this lawsuit.

RESPONSE: Defendant objects to this Interrogatory on the grounds it is ambiguous, vague, and overbroad. The Interrogatory is not limited to seeking the Defendant's "procedures" that would have been implicated by the "disputes" purportedly initiated by the Plaintiff, but instead seeks information regarding any "procedure designed to ensure the proper investigation or reinvestigation of disputed consumer data and the overall accuracy of the information in your consumer credit database and consumer reports you issued that was in use and in effect at the time of the incidents made the basis of this lawsuit."

Defendant further objects to this Interrogatory on grounds that it seeks confidential and proprietary information. If the Plaintiff agrees to limit the scope of this interrogatory to policies or procedures that would have been implicated regarding the specific dispute the Plaintiff claims to have made with respect to the debt the Defendant was attempting to collect, the Defendant will agree to provide responsive information if the Plaintiff will agree to enter into an appropriate confidentiality agreement.

INTERROGATORY NO. 6:

With regard to the Plaintiff's dispute letter, dated May 11, 2022, please describe the process of the reinvestigation and the result of the reinvestigation as set forth below:

- (a) List the date Plaintiff's dispute was received from Trans Union;
- (b) List the date IC System responded to the Plaintiff's dispute;
- (c) Describe the policy and procedure for investigating the dispute including what documents are to be consulted or reviewed; what documents are to be generated; and the identities or description of who is to be involved in any manner with making the decisions;
- (d) For Plaintiff's dispute, describe in detail whether the above described policy and procedure for investigating the dispute was followed; what documents were consulted or reviewed; what documents were generated; the identities of all persons involved in any manner with processing or handling the dispute and/or making the decision on the investigation; and the result of the investigation.
- (e) State what documents, if any, were received from Trans Union.

RESPONSE: Defendant has no knowledge of the alleged May 11, 2022 "dispute letter" nor does the Defendant have any record of receiving any such dispute letter from TransUnion related to the Plaintiff's account.

As indicated above, on May 23, 2022, Defendant received an ACDV from TransUnion with the E-Oscar code "001", which means "not mine." An I.C. System employee confirmed that certain personal identifying information included in the ACDV matched the information that ATT U-Verse had provided Defendant when it referred the account and, because the information matched, verified the accuracy of Defendant's credit reporting.

INTERROGATORY NO. 7:

Please identify or state what information or documents IC System relied upon in conducting the reinvestigation of Plaintiff's May 11, 2022 dispute.

RESPONSE: Defendant has no knowledge of the alleged May 11, 2022 "dispute letter" nor does the Defendant have any record of receiving any such dispute letter from TransUnion related to the Plaintiff's account.

As indicated above, on May 23, 2022, Defendant received an ACDV from TransUnion with the E-Oscar code "001", which means "not mine." An I.C. System employee confirmed that certain personal identifying information included in the ACDV matched the information that ATT U-Verse had provided Defendant when it referred the account and, because the information matched, verified the accuracy of Defendant's credit reporting.

INTERROGATORY NO. 8:

Please state why IC System confirmed or reported to Trans Union that the Account was accurate and that it belonged to Plaintiff after reinvestigating the Plaintiff's May 11, 2022 dispute.

RESPONSE: Defendant has no knowledge of the alleged May 11, 2022 "dispute letter" nor does the Defendant have any record of receiving any such dispute letter from TransUnion related to the Plaintiff's account.

As indicated above, on May 23, 2022, Defendant received an ACDV from TransUnion with the E-Oscar code "001", which means "not mine." An I.C. System employee confirmed that certain personal identifying information included in the ACDV matched the information that ATT U-Verse had provided Defendant when it referred the account and, because the information matched, verified the accuracy of Defendant's credit reporting.

INTERROGATORY NO. 9:

Please identify by name and job title each person at IC System that

conducted any part of the reinvestigation of Plaintiff's May 11, 2022 dispute.

RESPONSE: Defendant has no knowledge of the alleged May 11, 2022 "dispute letter" nor does the Defendant have any record of receiving any such dispute letter from TransUnion related to the Plaintiff's account.

As indicated above, on May 23, 2022, Defendant received an ACDV from TransUnion with the E-Oscar code "001", which means "not mine." An I.C. System employee confirmed that certain personal identifying information included in the ACDV matched the information that ATT U-Verse had provided Defendant when it referred the account and, because the information matched, verified the accuracy of Defendant's credit reporting.

INTERROGATORY NO. 10:

Please state each and every person or company that IC System or its agents or employees contacted in the course of reinvestigating the Plaintiff's May 11, 2022 dispute of the IC System trade line. For each and every such contact, please state:

- a. The date of the contact;
- b. The time of the contact;
- c. The manner or method of the contact;
- d. The name of the person or company contacted; and
- e. The contents of any communication with any person or company contacted as part of IC System's reinvestigation of Plaintiff's dispute.

RESPONSE: Defendant has no knowledge of the alleged May 11, 2022 "dispute letter" nor does the Defendant have any record of receiving any such dispute letter from TransUnion related to the Plaintiff's account.

As indicated above, on May 23, 2022, Defendant received an ACDV from TransUnion with the E-Oscar code "001", which means "not mine." An I.C. System employee confirmed that certain personal identifying information included in the ACDV matched the information that ATT U-Verse had provided Defendant when it referred the account and, because the information matched, verified the accuracy of Defendant's credit reporting.

INTERROGATORY NO. 12:

Did you use, hire or otherwise engage the services of any third party in conducting the reinvestigation of Plaintiff's dispute dated May 11, 2022? If so, please identify the name of the company or companies and person or persons who conducted the reinvestigation of Plaintiff's dispute at the direction of or on behalf of IC System.

RESPONSE: Defendant has no knowledge of the alleged May 11, 2022 "dispute letter" nor does the Defendant have any record of receiving any such dispute letter from TransUnion related to the Plaintiff's account.

As indicated above, on May 23, 2022, Defendant received an ACDV from TransUnion with the E-Oscar code "001", which means "not mine." An I.C. System employee confirmed that certain personal identifying information included in the ACDV matched the information that ATT U-Verse had provided Defendant when it referred the account and, because the information matched, verified the accuracy of Defendant's credit reporting.

As to objections:

/s/ Dale T. Golden
Dale T. Golden
Counsel for Defendant I.C. System, Inc.

**VERIFICATION OF
RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

I, Michelle K. Dove, as an authorized representative of I.C. SYSTEM, INC. believe, based on reasonable inquiry, that the foregoing answers are true and correct to the best of my knowledge, information and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Signature: Michelle K. Dove

Printed Name: Michelle K. Dove

Date: April 4, 2023

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHARON DORSEY,)
)
PLAINTIFF,)
)
v.) **2:22-cv-01489-ACA**
)
TRANS UNION, LLC, and I.C.)
SYSTEM, INC.)
)
DEFENDANTS.)

PLAINTIFF'S EXHIBIT 4
TO DEPOSITION OF
CORPORATE REPRESENTATIVE OF IC SYSTEMS, INC.

VIA CERTIFIED MAIL

TransUnion Consumer Relations
P. O. Box 2000
Chester, PA 19022-2000

To Whom it May Concern:

My name is Sharon Dorsey. My address is [REDACTED]
My birthdate is [REDACTED]. The last four digits of my social security number are [REDACTED] I am enclosing a copy of my Alabama drivers license so that you know it is me writing you about this issue. I am writing because there is false or inaccurate information that is being reported on my credit report that I want investigated and removed please.

When I moved to my current address in 2018, I wanted to have AT&T service for phone and internet. I was told it was \$101.00 per month for AT&T Uverse bundled service so I applied. After I applied for that service, I learned that AT&T Uverse service was not available at my address. To this day it is still not available and I have not had that service at my current home. I got bills for AT&T Uverse (even though it was not available to me at my address) which I did not owe since I couldn't even get the service and now a collection company called IC Systems is reporting on my credit that I owe ATT Uverse \$151.00. I do not owe this money as I have never had this service and this service was never available for me to have at my home. This debt that is being reported by IC Systems is false and inaccurate.

This false information that IC Systems is reporting has caused me to get denied for a Kohl's credit card and a Belk card. The fact that this company is reporting a debt that is false and is hurting my credit when I do not owe it has caused me much stress and anxiety. Please get this off my credit.

It is my understanding that you are required by the Fair Credit Reporting Act to investigate the entry on my credit report from IC Systems about the Uverse debt and respond to me after you investigate. I believe that AT&T will tell you that I cannot even get Uverse service at my house and so there's no way I owe money for a service I cannot even get. Please mail any response to my letter to my mailing address:

Sharon Dorsey
[REDACTED]

If you need more information from me. You can call me at 205-601-1146 or write me and I will try my best to give you whatever information you need. If this account is not being reported on my credit report, please let me know that as well as I am concerned that this account is being reported even though I don't owe this debt and never have owed the debt.

I look forward to hearing back from you.

Sincerely,

Sharon Dorsey

Sharon Dorsey

Enclosure

RECEIPT 9214 000 0001 0005 0024 14	
FROM: Ms. Sharon Dorsey RE: Dispute TransUnion	
SEND TO: TransUnion Consumer Relations PO Box 2000 Chester PA 19022	
FEES: Postage 0.53 Certified Fee 3.75 Return Receipt 3.03 Restricted	
TOTAL	\$ 7.33
POSTMARK OR DATE	



DRIVER LICENSE
ALABAMA

Secretary Hal Taylor
Secretary of Law Enforcement

Hal Taylor

DEFENDANT

JUDGMENT

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHARON DORSEY,)
)
PLAINTIFF,)
)
v.) **2:22-cv-01489-ACA**
)
TRANS UNION, LLC, and I.C.)
SYSTEM, INC.)
)
DEFENDANTS.)

PLAINTIFF'S EXHIBIT 5
TO DEPOSITION OF
CORPORATE REPRESENTATIVE OF IC SYSTEMS, INC.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHARON DORSEY,

Plaintiff,

v.

Case No.: 2:22-cv-01489-GMB

TRANS UNION, LLC and
IC SYSTEM, INC.,

Defendants.

/

AMENDED RESPONSES TO PLAINTIFF'S REQUESTS FOR ADMISSIONS

Defendant, I.C. SYSTEM, INC. ("Defendant" and/or "ICS"), by and through its undersigned counsel, serves it Amended Responses to Plaintiff's Request for Admissions, and states:

1. Admit or deny that Plaintiff did not owe the Account that IC System was attempting to collect and that IC System reported to TransUnion.

RESPONSE: Defendant objects to this Request because it asks the Defendant to admit facts that require first-hand knowledge of the Plaintiff's purported debt owed to a third party, to wit, ATT U-Verse. Defendant lacks sufficient knowledge or information to admit or deny this Request. While the Plaintiff claims she does not owe the debt, ATT U-Verse referred the account to the Defendant as validly due and owing and has never indicated otherwise to the Defendant.

2. Admit or deny that IC System wrongly verified to Trans Union the information disputed by Plaintiff in her May 11, 2022 dispute was accurate.

RESPONSE: (amended per May 2, 2023 letter from W. Whitney Seals, counsel for the Plaintiff, stating, as relevant here: "In response to RFAs 2-5 ICS objected that 'Plaintiff's May 11, 2022 dispute' was ambiguous. We are asking about the

May 2022 dispute that ICS allegedly investigated that is made the basis of this lawsuit.”) Denied.

3. Admit or deny that IC System's employees or agents who processed Plaintiff's May 11, 2022 dispute of the IC System Collection Service, Inc. item on her credit report complied with all relevant IC System policies or procedures in and about reinvestigating Plaintiff's May 11, 2022 dispute of the IC System Collection Service, Inc. item on her credit report.

RESPONSE: (amended per May 2, 2023 letter from W. Whitney Seals, counsel for the Plaintiff, stating, as relevant here: “In response to RFAs 2-5 ICS objected that ‘Plaintiff’s May 11, 2022 dispute’ was ambiguous. We are asking about the May 2022 dispute that ICS allegedly investigated that is made the basis of this lawsuit.”) Admitted.

4. Admit or deny that IC System is required to comply with the requirements of the Fair Credit Reporting Act when it processes disputes such as Plaintiff's May 11, 2022 dispute of the IC System Collection Service, Inc. item on her credit report.

RESPONSE: (amended per May 2, 2023 letter from W. Whitney Seals, counsel for the Plaintiff, stating, as relevant here: “In response to RFAs 2-5 ICS objected that ‘Plaintiff’s May 11, 2022 dispute’ was ambiguous. We are asking about the May 2022 dispute that ICS allegedly investigated that is made the basis of this lawsuit.”) Admitted that I.C. System is required to comply with requirements of the FCRA implicated in processing consumer disputes related to I.C. System’s credit reporting of accounts.

5. Admit or deny that IC System did not rely on any source of information other than IC System's own internal records in the reinvestigation of Plaintiff's May 11, 2022 dispute.

RESPONSE: (amended per May 2, 2023 letter from W. Whitney Seals, counsel for the Plaintiff, stating, as relevant here: “In response to RFAs 2-5 ICS objected that ‘Plaintiff’s May 11, 2022 dispute’ was ambiguous. We are asking about the

May 2022 dispute that ICS allegedly investigated that is made the basis of this lawsuit.”) Denied.

/s/Dale T. Golden
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of May 2023, a true and correct copy of the above and foregoing document has been sent by Electronic Mail to the following parties:

Whitney Seals
filings@cochrunseals.com
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Co-counsel for Defendant I.C. System, Inc.

By:

/s/ Dale T. Golden
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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHARON DORSEY,

Plaintiff,

v.

Case No.: 2:22-cv-01489-GMB

TRANS UNION, LLC and
IC SYSTEM, INC.,

Defendants.

/

AMENDED RESPONSES TO PLAINTIFF'S REQUESTS FOR ADMISSIONS

Defendant, I.C. SYSTEM, INC. ("Defendant" and/or "ICS"), by and through its undersigned counsel, serves it Amended Responses to Plaintiff's Request for Admissions, and states:

1. Admit or deny that Plaintiff did not owe the Account that IC System was attempting to collect and that IC System reported to TransUnion.

RESPONSE: Defendant objects to this Request because it asks the Defendant to admit facts that require first-hand knowledge of the Plaintiff's purported debt owed to a third party, to wit, ATT U-Verse. Defendant lacks sufficient knowledge or information to admit or deny this Request. While the Plaintiff claims she does not owe the debt, ATT U-Verse referred the account to the Defendant as validly due and owing and has never indicated otherwise to the Defendant.

2. Admit or deny that IC System wrongly verified to Trans Union the information disputed by Plaintiff in her May 11, 2022 dispute was accurate.

RESPONSE: (amended per May 2, 2023 letter from W. Whitney Seals, counsel for the Plaintiff, stating, as relevant here: "In response to RFAs 2-5 ICS objected that 'Plaintiff's May 11, 2022 dispute' was ambiguous. We are asking about the

May 2022 dispute that ICS allegedly investigated that is made the basis of this lawsuit.”) Denied.

3. Admit or deny that IC System's employees or agents who processed Plaintiff's May 11, 2022 dispute of the IC System Collection Service, Inc. item on her credit report complied with all relevant IC System policies or procedures in and about reinvestigating Plaintiff's May 11, 2022 dispute of the IC System Collection Service, Inc. item on her credit report.

RESPONSE: (amended per May 2, 2023 letter from W. Whitney Seals, counsel for the Plaintiff, stating, as relevant here: “In response to RFAs 2-5 ICS objected that ‘Plaintiff’s May 11, 2022 dispute’ was ambiguous. We are asking about the May 2022 dispute that ICS allegedly investigated that is made the basis of this lawsuit.”) Admitted.

4. Admit or deny that IC System is required to comply with the requirements of the Fair Credit Reporting Act when it processes disputes such as Plaintiff's May 11, 2022 dispute of the IC System Collection Service, Inc. item on her credit report.

RESPONSE: (amended per May 2, 2023 letter from W. Whitney Seals, counsel for the Plaintiff, stating, as relevant here: “In response to RFAs 2-5 ICS objected that ‘Plaintiff’s May 11, 2022 dispute’ was ambiguous. We are asking about the May 2022 dispute that ICS allegedly investigated that is made the basis of this lawsuit.”) Admitted that I.C. System is required to comply with requirements of the FCRA implicated in processing consumer disputes related to I.C. System’s credit reporting of accounts.

5. Admit or deny that IC System did not rely on any source of information other than IC System's own internal records in the reinvestigation of Plaintiff's May 11, 2022 dispute.

RESPONSE: (amended per May 2, 2023 letter from W. Whitney Seals, counsel for the Plaintiff, stating, as relevant here: “In response to RFAs 2-5 ICS objected that ‘Plaintiff’s May 11, 2022 dispute’ was ambiguous. We are asking about the

May 2022 dispute that ICS allegedly investigated that is made the basis of this lawsuit.”) Denied.

/s/Dale T. Golden
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of May 2023, a true and correct copy of the above and foregoing document has been sent by Electronic Mail to the following parties:

Whitney Seals
filings@cochrunseals.com
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Co-counsel for Defendant I.C. System, Inc.

By:

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Counsel for Defendant I.C. System, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHARON DORSEY,)
)
PLAINTIFF,)
)
v.) **2:22-cv-01489-ACA**
)
TRANS UNION, LLC, and I.C.)
SYSTEM, INC.)
)
DEFENDANTS.)

PLAINTIFF'S EXHIBIT 6
TO DEPOSITION OF
CORPORATE REPRESENTATIVE OF IC SYSTEMS, INC.



AT&T
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NORTH PALM BEACH FL 33408

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(888) 938-4715 (Fax)

DECLARATION OF AUTHENTICITY OF AT&T RECORDS

STATE OF FLORIDA
COUNTY OF PALM BEACH

GLDC FILE NUMBER: 3705371

I, Brian Dacosta, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by AT&T, and my title is Legal Compliance Analyst. After a thorough search of the documents relied on in the course of my duties as Custodian of Records and Compliance Security Analyst, I was unable to find any information responsive to your request.

Pursuant to 28 U.S.C. Sec.1746, I declare, under penalty of perjury, that the foregoing is true and correct.

Brian Dacosta

06-27-2023
Date

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHARON DORSEY,)
)
PLAINTIFF,)
)
v.) **2:22-cv-01489-ACA**
)
TRANS UNION, LLC, and I.C.)
SYSTEM, INC.)
)
DEFENDANTS.)

PLAINTIFF'S EXHIBIT 7
TO DEPOSITION OF
CORPORATE REPRESENTATIVE OF IC SYSTEMS, INC.



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